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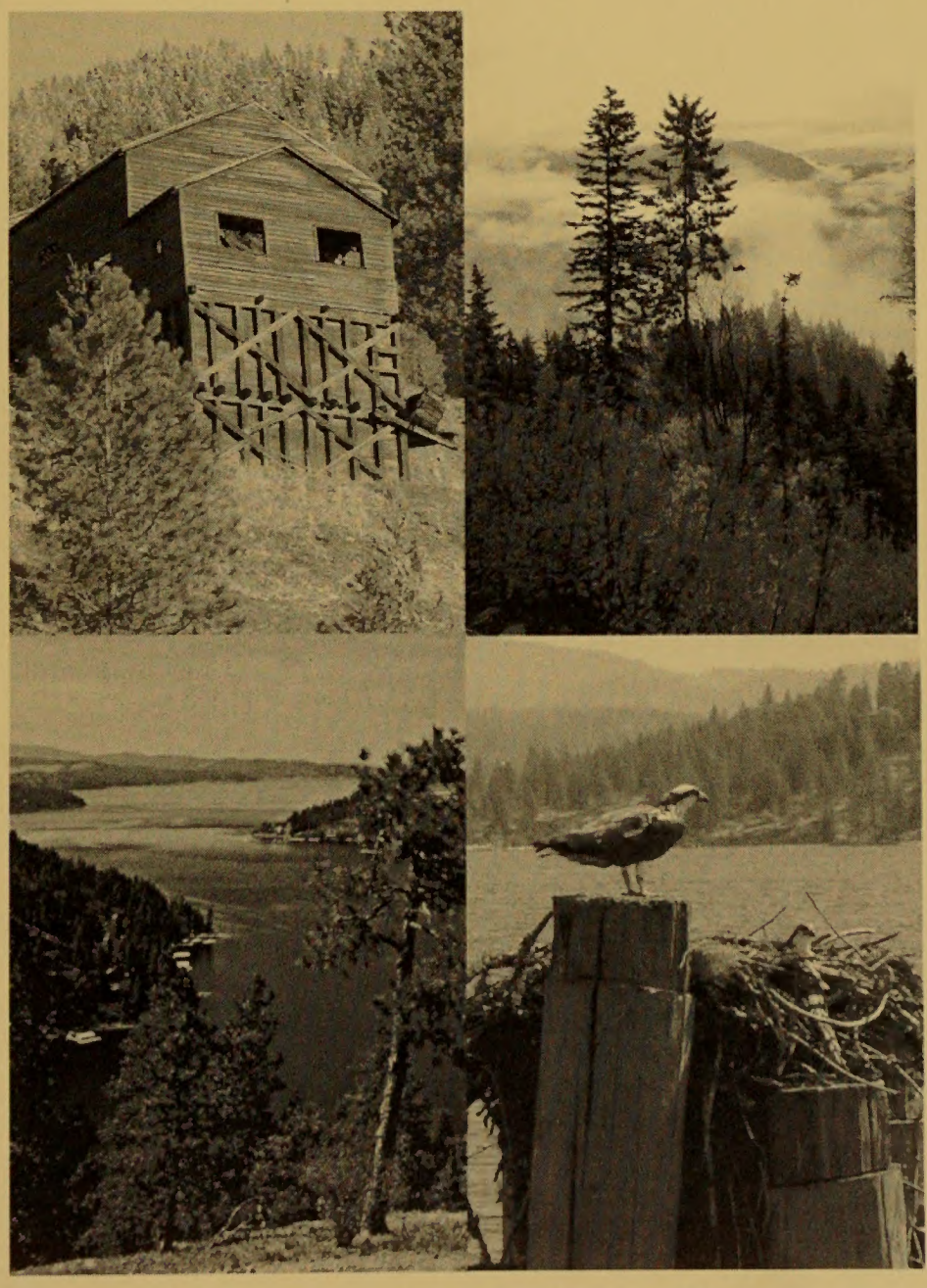
Proposed Coeur d'Alene Resource Management Plan and Final Environmental Impact Statement

ID-410-2005-EIS-1059



Volume II – Appendices

October 2006

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Proposed Coeur d'Alene Resource Management Plan and Final Environmental Impact Statement

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Coeur d'Alene Field Office
Coeur d'Alene, Idaho

Volume II – Appendices
October 2006

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LIST OF MAPS

Only maps that have revised from the draft are included with this document and are attached at the end of this volume. For all other maps, see the Draft Coeur d'Alene RMP/EIS, Volume III. Copies of the Draft Volume III maps are available on the project website at http://www.blm.gov/rmp/id/cda/, or upon request from BLM (call 208-769-5000 or email information@cdarmp.com).

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APPENDICES

APPENDIX A – BEST MANAGEMENT PRACTICES

APPENDIX A: BEST MANAGEMENT PRACTICES (BMPs)

The best management practices (BMPs) in this appendix would be applied under Alternatives B, C, and D, when appropriate or called for by the alternatives. Appendix B contains BMPs for current management (Alternative A).

In addition to the guidelines in Appendix D (CNFISH), these Best Management Practices (BMPs) expand and supplement the basic guidelines and minimum requirements of the BLM manual; the Idaho Department of Lands (Forest Practices Regulations); Idaho Department of Water Resources (IDWR) Stream Channel Alteration Regulations; and the Corps of Engineers 404 Regulations. Also included are the EPA Source Water Guidelines and BLM's Wind Energy BMPs.

SECTION A-1: GENERAL BEST MANAGEMENT PRACTICES

1. Road Planning, Design, and Location

- Plan road standards and specifications that maintain forest productivity, water quality, and fish and wildlife habitat.

- Road specifications and plans should be consistent with good safety practices. Plan each road to the minimum standards for the intended use. Adapt the plans to the soil materials and terrain, to minimize disturbance and damages to forest productivity, water quality, and wildlife habitat.

- Plan transportation networks to minimize road construction within riparian conservation areas. Leave or re-establish areas of vegetation between roads and streams.

- Plan roads no wider than necessary for safety and anticipated use. Minimize and balance cuts and fills, especially near streams. Fit the road to the natural terrain as closely as possible.

- Dispose of excavated waste material on geologically stable sites.

- While cut-and-fill road construction is common for gentle terrain, full-bench roads should be designed on slopes over 60 percent. End-haul excess material to a geologically stable site for disposal.

- Plan natural road cross-drainage by insloping or outsloping and by grade changes. Plan for effective, well-placed dips or water bars.

- Design relief culverts or roadside ditches where natural drainage will not protect the road surface, excavation, or embankment. Plan relief culvert locations to prevent fill erosion or direct discharge of sediment into streams.

- Plan minimum number of stream crossings. Make sure they comply with Stream Channel Alteration Law, Title 42; Chapter 38, Idaho Code. Be sure all Class I stream culvert installations allow fish passage.

- Consider reusing existing roads if new construction would result in more long-term impact to fish and wildlife.

Road Construction

- Construct roads in a manner that prevents debris, overburden, and excess materials from entering streams. Deposit excess materials outside of stream protection zones.

- Construct roads to comply with Idaho Forest Practices Act (FPA) plan and design guidelines.
- Provide for quarry drainage, to prevent sediment from entering streams.
- Clear drainage ways of all debris, generated during construction or maintenance that may interfere with drainage or impact water quality.
- When constructing road fills near streams, compact the material to settle it, reduce erosion, and reduce water entry into fill. Minimize snow, ice, frozen soil, and woody debris buried in embankments.
- Construct road stream crossings or roads constricting upon a stream channel in compliance with the Stream Channel Alteration Law, Title 42, Chapter 38, Idaho Code.
- Stabilize slopes: Where exposed material (excavation, embankment, waste piles, etc.) is erodible and may enter streams, stabilize it before fall or spring runoff by seeding, compacting, riprapping benching, mulching, or other suitable means.
- Construct cross drains and relief culverts to prevent erosion. Use rip rap, woody debris, down spouts, or similar devices to prevent erosion of fills. Install drainage structures on uncompleted roads before fall or spring runoff.
- Install relief culverts with a minimum drain grade of 2 percent.
- Design roads to balance cuts and fills or use full bench construction where stable fill construction is not possible.
- Minimize sediment production from borrow pits and gravel sources through proper location, development and reclamation.
- Place debris, overburden, and other waste materials associated with construction and maintenance activities in a location to avoid entry into streams. Include these waste areas in soil stabilization planning for the road.

Road Drainage

- Provide adequate drainage from the surface of all permanent and temporary roads by using outsloped or crowned roads, drain dips, or insloped roads with ditches and crossdrains.
- Vary road grades to reduce concentrated flow in road drainage, ditches, culverts, and on fill slopes and road surfaces.
- Space road drainage features so peak drainage flow on the road surface or in ditches will not exceed the capacity of the individual drainage facilities.
- Outsloped Roads: Outsloped roads provide means of dispersing water in a low-energy flow from the road surface. Outsloped roads are appropriate when fill slopes are stable, drainage will not flow directly into stream channels, and transportation safety considerations can be met.
- Insloped Roads: For insloped roads, plan ditch gradients steep enough, generally greater than 2 percent, but less than 8 percent to prevent sediment deposition and ditch erosion. The higher gradients may be suitable for more stable soils; use the lower gradients for less stable soils.

- Drain Dips: Properly constructed drain dips can be an economical method of channeling surface flow off the road. Construct drain dips deep enough into the subgrade so that traffic will not obliterate them.

- Prevent downslope movement of sediment by using sediment catch basins, drop inlets, changes in road grade, or recessed cut slopes.

- Where possible, install ditch relief culverts at the gradient of the original ground slope; otherwise armor outlets with rock or anchor downspouts to carry water safely across the fill slope.

- Skew ditch relief culverts 20 to 30 degrees toward the inflow from the ditch to improve inlet efficiency. Protect the upstream end of cross-drain culverts from plugging.

- Provide energy dissipators (rock piles, logs, etc.) where necessary at the downstream end of ditch relief culverts to reduce the erosion energy of the emerging water.

- Cross drains, culverts, water bars, dips, and other drainage structures should not be discharged onto erodible soils or fill slopes without outfall protection.

- Design roads for minimal disruption of drainage patterns

- Route road drainage through vegetation, slash windrows, or other sediment settling structures. Install road drainage features above stream crossings to route discharge into filtration zones before entering a stream.

Road Maintenance

- Maintain erosion control features through periodic inspection and maintenance, including cleaning dips and cross-drains, repairing ditches, marking culvert inlets to aid in location, and clearing debris from culverts.

- Avoid using roads during wet periods if such use would damage the road drainage features.

- Grade road surfaces only as often as necessary to maintain a stable running surface and to retain the original surface drainage.

- Avoid cutting the toe of cut slopes when grading roads or pulling ditches.

- Place all excess material removed by maintenance operations in safe disposal sites and stabilize these sites to prevent erosion. Avoid locations where erosion will carry materials into a stream.

Timber Harvesting Activities

- Stabilize or reclaim landings and temporary roads on completion of use.

- For each landing, skid trail, or fire trail, provide and maintain a drainage system to control the dispersal of water and to prevent sediment from entering streams.

- Install necessary cross-ditches on tractor skid trails. Appropriate spacing between cross-ditches is determined by the soil type and slope of the skid trails. Timely implementation is important.

- When natural re-vegetation is inadequate to prevent accelerated erosion before the next growing season, apply seed or construct cross-ditches on skid trails, landings, and fire trails. A light ground cover of slash or mulch will retard erosion.

Recommended Cross-ditch Spacing Distance for Roads and Skid Trails

Grade of Road or Trail	Unstable Soils (High Erosion Hazard)	Stable Soils (Low Erosion Hazard)
2	135'	170'
5	100'	140'
10	80'	115'
15	60'	90'
20	45'	60'
25+	30'	40'

Slash Treatment and Site Preparation

- Use excavators equipped with rakes or crawler-tractors/rubber-tire skidders equipped with brush blades when piling slash. Avoid use of dozers with angle blades.

- Scarify the soil only to the extent necessary to meet the reforestation objective of the site. Site preparation equipment producing irregular surfaces is preferred. Care should be taken to preserve the surface soil horizon.

- Large woody debris may be left to slow surface runoff, return soil nutrients, provide shade for seedlings, and provide habitat for wildlife.

- Carry out brush piling and scarification when soils are frozen or dry enough to minimize compaction and displacement.

- Minimize or eliminate elongated exposure of soils up and down the slope during mechanical scarification. On steep slopes, carry out scarification in a manner that minimizes erosion.

Vegetation Treatments

If herbicides are proposed for use, buffer strips will be provided adjacent to dwellings, domestic water sources, agricultural land, streams, lakes, and ponds. A minimum100-foott wide buffer strip will be a provided for aerial application, 25 feet for vehicle application and 10 feet for hand application. Any deviations must be in accordance with the label for the herbicide. Herbicides will be wiped on individual plants within 10 feet of water where application is critical.

SECTION A-2: EPA REGION 10 SOURCE WATER PROTECTION BEST MANAGEMENT PRACTICES FOR USFS AND BLM

The following pages include a listing of BMPs. Some are required by USDA Forest Service and Bureau of Land Management (BLM) management plans or by State administrative code. Others are recommendations or are informed by a legal decision. This list represents an initial effort to pull together BMPs from a host of sources to assist in protection of drinking water sources. The first two sections define "Conservative Riparian Reserve Widths" and "Riparian Habitat Conservation Areas." The third, "Watershed Management Planning," pertains generally to all actions undertaken by the USFS or BLM. The remaining sections pertain to more specific types of activities, facilities, or structures on USFS or BLM lands, such as roads, recreational facilities, and fire suppression activities.

Context and Background

The USDA Forest Service and BLM have a long history of using BMPs related to timber harvest, grazing, mining, and other land management activities to reduce adverse impacts to water quality. Forest and range land management activities generate diffuse sources of pollution known as nonpoint sources. Assessments of water quality completed at the national level and at the watershed scale have consistently demonstrated that nonpoint sources of pollution (agriculture, mining, construction, forestry, etc.) are the primary cause of water quality impairment. Point sources of pollution, like wastewater treatment facilities and factories, are required to treat effluent to meet water quality standards consistent with State or Federally issued discharge permits. Nonpoint sources require a different approach. BMPs are the primary management mechanism for preventing or reducing impacts to water quality from nonpoint sources. Many States have designated the Forest Service and BLM as the management agencies for implementing BMPs on lands they manage to ensure that water quality standards are met.

Forest Service and BLM lands, usually located in the upper portion of a watershed, capture a significant portion of the precipitation that ends up as drinking water for millions of people in the Pacific Northwest. The Safe Drinking Water Act required states to delineate source water areas for every public drinking water system and assess risks of potential contamination within those areas. Infrastructure and activities of the Forest Service and BLM are included among many identified potential sources of contamination to drinking water supplies. Careful planning and implementation can mitigate the risks of contamination from Forest Service and BLM operations and activities.

The effectiveness of BMPs applied on federal lands affects the quality of water entering drinking water wells and intakes on both federal lands and downstream non-federal lands. Providing the highest quality water possible to the drinking water intakes should be an overriding goal of BMPs. BMPs cover a full spectrum of active and passive measures and can be applied during assessment, planning, project implementation, and monitoring activities. The following BMPs are an initial "draft" starting point for helping to ensure that public health is protected and that water treatment and facility operation and management costs are minimized. This list is intended to serve as a "menu" from which appropriate BMPs can be selected for a specific plan or project. It's not a comprehensive list. Additional BMPS may be appropriate, depending on the project.

These BMPs come from a variety of sources, some of which pertain to specific geographic regions. As "best" management practices, they can be applied in other geographic regions as well. Some of them are clearly designed to protect water quality for fish and other aquatic life. They are appropriately included in this list because good water quality also benefits drinking water supplies.

Best Management Practices

Watershed Management Planning

- Employ watershed restoration projects where appropriate to repair degraded watershed conditions and improve water quality and soil stability.

- Avoid, where possible, the long- and short-term adverse impacts to water quality associated with the occupancy and modification of floodplains.

- Avoid destruction of wetlands.

- Prevent contamination from accidental spills.

- An Oil and Hazardous Substance Spill Contingency Plan is a predetermined organization and action plan to be implemented in the event of a hazardous substance spill.

- A Spill Prevention Control and Countermeasures (SPCC) Plan is required if the total amount of oil products on site in above-ground storage exceeds 1320 gallons, or if a single container exceeds a capacity of 660 gallons.

- Ensure activities conducted under Special Use Permits are protective of source waters.

- Conduct water quality monitoring to determine the effects of land management activities on the beneficial uses of water, and to ensure the health and safety of water users.

- Minimize the amount of erosion and sedimentation at developed sites.

- Source: General Water Quality Best Management Practices, Pacific Northwest Region, November 1988

- Take active measures, if necessary, to avoid any activity within 300 yards of a spring used as a source of drinking water.

Hardrock Mining

Concern for: Surface Water, Ground Water

Contaminants: Metals (e.g., lead, selenium, cadmium, copper, zinc, arsenic, mercury), acidity (low pH), cyanide, sulfate, turbidity

Both the US Forest Service and Bureau of Land Management have extensive internal guidance on mine permitting and reclamation requirements.

Two documents available on the EPA Region 10 website provide detailed information that should be reviewed when addressing mining issues:

EPA and Hardrock Mining: A Source Book for Industry in the Northwest and Alaska,
U.S. EPA Region 10, January 2003
http://yosemite.epa.gov/r10/water.nsf/59f3b8c4fc8c923988256b580060f5d9/e4ba15715e97ef2188256d2c00783a8e!OpenDocument

Inactive Mine Site Characterization and Cleanup Handbook, EPA 910-8-00-001, U.S. EPA, August 2000
http://yosemite.epa.gov/R10/CLEANUP.NSF/9f3c21896330b4898825687b007a0f33/f4724f10ccdc2f4d8825699a007861dd?OpenDocument

BLM Districts in Idaho should consult:

Best Management Practices for Mining in Idaho, prepared by The Idaho Department of Lands in conjunction with other State and Federal Agencies through the Idaho Mining Advisory Committee, 1992.

Grazing

Concern for: Surface Water

Contaminants: Pathogens (E. Coli, cryptosporidium, viruses, giardia lambia), sediment, turbidity, phosphate, nitrates, coliform, sulfate.

(Sources: Drinking Water from Forests and Grasslands: A Synthesis of Scientific Literature, United States Department of Agriculture Forest Service, General Technical Report SRS-39, September 2000, pp. 153-156. Potential Sources of Drinking Water Contamination Index, EPA. www.epa.gov/safewater/swp/sources1.html)

Best Management Practices:

- Manage the timing and intensity of grazing to:

  -enhance, or at a minimum, prevent the degradation of, riparian vegetation,

  -enhance infiltration of surface water into the ground, and

  -ensure stream banks are protected.

- Within source water protection areas, sheep grazing is preferable over cattle because sheep tend to graze in upland areas while cattle tend to spend time in the streams.

- The exclusion of cattle from areas where cryptosporidium may be a concern (such as Source Water Areas) should be considered. If this is not feasible, livestock younger than 4 months should be kept out of the watershed, because calves have not yet developed resistance, and shed greater numbers of oocysts than older animals.

(Source: Drinking Water from Forests and Grasslands: A Synthesis of Scientific Literature, United States Department of Agriculture Forest Service, General Technical Report SRS-39, September 2000, pp. 153-156)

- Locate new livestock handling and/or management facilities outside riparian reserves. For existing livestock handling facilities inside the riparian reserve, ensure that Aquatic

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Conservation Strategy objectives are met. Where these objectives cannot be met, require relocation or removal of such facilities.

(Source: Aquatic Conservation Strategy, Attachment A to the Record of Decision for Amendments to Forest Service and Bureau of Land Management Planning Documents Within Range of the Northern Spotted Owl, pp. C-33)

- Manage livestock numbers and season of use to maintain and protect soil and water resources.
- Construct fences or other barriers to keep livestock out of sensitive areas where loss of vegetative cover, soil compaction, or riparian impairment could adversely impact water quality.

(Source: General Water Quality Best Management Practices, Pacific Northwest Region, U.S. Forest Service, November 1988)

Landfills

Concern for: Ground Water, Surface Water

Contaminants: Volatile organic compounds (VOC's), heavy metals, pesticides, nitrates and nitrites, semi-volatile organic compounds.

(Source: Potential Sources of Drinking Water Contamination Index, EPA. www.epa.gov/safewater/swp/sources1.html)

Best Management Practices

- Site new landfills outside of source water protection areas if possible. If not possible, site them where they are unlikely to pose a threat to ground water or surface waters.
- For historic landfills located in source water protection areas, examine existing data to determine whether they may pose a threat to the drinking water source. If a landfill may pose a threat, collect additional data to determine whether it does. If it does, plan and implement appropriate mitigative action.

(Source: EPA Region 10 recommendations)

Recreation Sites

Concern for: Ground Water, Surface Water *Contaminants:* Turbidity, sedimentation, fecal material, household cleansers and detergents, garbage and other floatables, cooking grease and oil, antifreeze, motor oil, illegal dumping of hazardous materials

Best Management Practices

- Wastewater from sanitation facilities can contaminate surface and ground water with bacteria, nutrients, and chemicals. Sanitation facilities (ranging from pit toilets to treatment plants) will be planned, located, designed, constructed, operated, inspected, and maintained to minimize possibilities of water contamination. All activities related to location, design, inspection, operation, and maintenance will be performed by trained, qualified personnel.

- Refuse disposal will be managed to protect surface and subsurface soil and water resources from contamination by nutrients, bacteria, and chemicals.

- Prohibit discharges and disposal of human and animal waste, petroleum products, and other hazardous substances in or near streams in recreation areas. Educate the public to conduct their activities in ways that will not degrade water quality.

- Avoid degradation of water quality by locating pack and riding stock facilities at safe locations away from springs, streams, lakes, wet meadows, and other surface waters.

(Source: General Water Quality Best Management Practices, Pacific Northwest Region, U.S. Forest Service, November 1988)

- RV sewage waste should not be disposed of in septic system drainfields given the potential for chemicals in the sewage waste to kill the microorganisms that drainfields need to function. (Source: EPA Region 10 Recommendation)

Timber Management
Concern for: Surface Water *Contaminants:* Turbidity, decreased dissolved oxygen, pathogens, nitrogen

Best Management Practices

- Plan, supervise, and implement forest projects that will minimize soil compaction and soil disturbance.
- Maintain as much ground cover as possible to reduce surface runoff and erosion.
- Minimize site disturbance.
- Re-establish vegetation as soon as practicable.
- Keep pesticides and fertilizers out of surface waters

(Source: Drinking Water from Forests and Grasslands: A Synthesis of Scientific Literature, United States Department of Agriculture Forest Service, General Technical Report SRS-39, September 2000, pp. 108-113)

- Prevent downstream water quality degradation by the timely identification of areas
- Use mitigative measures to reduce the impacts of erosion, and subsequent sedimentation, on log landings.
- Ensure that constructed erosion control structures are stabilized and working.
- Prevent pollutants such as fuels, lubricants, bitumens, raw sewage, wash water and other harmful materials from being discharged into or near rivers, streams, and impoundments or into natural or man-made channels leading thereto.

(Source: General Water Quality Best Management Practices, Pacific Northwest Region, U.S. Forest Service, November 1988.)

Fire Management
Concern for: Surface Water *Contaminants:* Sediment and turbidity, nitrates, nitrites, sulfate, pH, TDS, chloride, iron, phosphate, taste/color/smell *USGS Emerging Contaminant:* fire retardant

Best Management Practices

- Avoid spraying fire retardant in or near drinking water streams, if practicable.
- Utilize Burn Area Emergency Rehabilitation (BAER) in appropriate circumstances.
- During fire suppression efforts, avoid watershed damage in excess of that which would be caused by the fire itself. Avoid heavy equipment operation on fragile soils and steep slopes when possible.

Project fires should use a Resource Advisor and watershed specialists to advise the Incident Commander on resource values during the suppression effort.

- Stabilize all areas that have had their erosion potential significantly increased, or their drainage pattern altered by wildfires or by suppression related activities. Treatments include, but are not limited to:
  - installing water bars and other drainage diversions in fire roads, firelines, and other cleared areas;
  - seeding, planting and fertilizing to provide vegetative cover;
  - spreading slash or mulch to protect bare soil;
  - repairing damaged road drainage facilities;
  - clearing stream channels of structures or debris that is deposited by suppression activities;
  - log erosion barriers (contour-felled and anchored trees)
  - channel stabilization structures
  - trash racks above road drainage structures
  - debris retention structures

- Provide for water quality protection in formulating prescribed fire prescriptions. Prescription elements include fire weather, slope, aspect, soil moisture, and fuel moisture. These elements influence the fire intensity and thus have a direct effect of whether or not a desired ground cover remains after burning, and whether or not a water repellent layer is formed. The amount of remaining ground cover and extensiveness of water repellant soil can significantly affect erosion rates.

- Maintain soil productivity, minimize erosion, and prevent ash, sediment, nutrients, and debris from entering water bodies during prescribed fires. Some of the techniques used to prevent water quality degradation include:
  - maintaining the integrity of the Stream Management Unit or streamcourse
  - planning prescribed fires with intensities that will not result in soils becoming hydrophobic

(Source: General Water Quality Best Management Practices, Pacific Northwest Region, U.S. Forest Service, November 1988.)

Pesticides

Concern for: Ground Water, Surface Water

Contaminants: Organic and inorganic chemicals

Best Management Practices

- Only use U.S. EPA registered pesticides and comply with all label directions for use.

- Ensure proper transportation, handling and application according to the label.

- Do not apply during or right before significant weather events, such as heavy rainfall, which will cause runoff of pesticides.

- Store pesticides according to label directions so that spills and loss are prevented.

- Mix and load pesticides on impermeable surfaces where any accidental spills would not enter surface waters or potentially impact drinking water supplies.

- Contain and clean up spills immediately; report spills to appropriate regulatory agency.

- Dispose of containers properly; recycle if possible.

(Sources: Drinking Water Academy, Managing Large-Scale Application of Pesticides to Prevent Contamination of Drinking Water, EPA-916-F-01-030, July 2001, and WAC Chapter 222-38)

- Notify downstream water systems so the appropriate operational changes can be made prior to spraying to utilize appropriate filtration or switch to ground water sources.

- Consider alternatives to pesticide and herbicide use including biological controls, prescribed fire, mechanical treatments, and silvicultural management systems which minimize or eliminate the need for chemical use (un-even aged management, single and group tree selection, etc.).

(Source: EPA Region 10 recommendations)

Fertilizers

Concern for: Ground Water, Surface Water co*ntaminants:* Nitrogen and phosphorous, and other nutrients

Best Management Practices

- Apply fertilizers at appropriate agronomic rates so that no ground water pollution will occur below the root zone.
- Do not apply fertilizer during or right before significant weather events, such as heavy rainfall, which will cause runoff of pesticides
- Storage and loading areas should be located where accidental spills will not enter surface waters and should not be located near wellheads.
- Follow label directions for storage, mixing, and disposal
- Prevent fertilizers from entering streams with drinking water intakes.
- Contain and clean up all spills immediately; report to appropriate regulatory agency

(Source: Drinking Water from Forests and Grasslands: A Synthesis of Scientific Literature, United States Department of Agriculture Forest Service, General Technical Report SRS-39, September 2000, pp. 113-115, WAC Chapter 222-38)

Underground Injection Control (UIC) Class V (Shallow) Wells

** *UIC Class V wells are shallow subsurface fluid distribution systems that are designed to place fluids directly below the ground surface. Examples of Class V wells include septic system drainfields, storm water wells, drywells, industrial or commercial disposal wells, aquifer remediation wells, abandoned drinking water wells. Ditches and trenches may be classified as UIC wells. Hazardous waste injection through shallow wells is prohibited.*

Concern for: GW *Contaminants:* Various – may include storm water, solvents, hydrocarbons, motor vehicle fluids, nitrate, bacteria, viruses, septage, and others

Best Management Practices

- EPA and State Regulations apply to the registration, operation, maintenance, and closure of UIC wells. Information is available on the EPA UIC website: http://www.epa.gov/safewater/uic/index.html. Please contact the appropriate regulatory agency for information about the rules that apply to your well:

  Idaho: John Sharkey, Idaho Department of Water Resources
  208-287-4934

Septic systems

Concern for: GW *Contaminants:* Nitrates, bacteria, viruses, septage

Best Management Practices

- Septic systems designed for more than 20 people per day, fall under State or EPA UIC Class V regulations. If septic systems are designed for fewer than 20 people per day, then other state or local regulations may apply.
- Siting: locate septic systems far enough from drinking water sources to avoid potential contamination (minimum setback distances are typically defined by state or local governments that have oversight of UIC or septic programs)
- Septic tanks and drainfields must be of adequate size to properly treat the volume of wastewater
- Design should be completed by a licensed engineer
- Proper operation and maintenance are imperative
- Pump septic tanks every 2 to 5 years
- Hazardous chemicals should be taken to a hazardous waste collection site rather than disposed into a septic system

(Source: Drinking Water Academy Bulletin, Managing Septic Systems to Prevent Contamination of Drinking Water, July 2001, EPA-816-F-01)

Abandoned Wells

Concern for: Ground Water *Contaminants:* Various – they serve as conduits for any pollutants; typical contaminants are storm water, solvents, nitrates, bacteria, viruses, phosphates, hydrocarbons, pesticides, and others. Source: Potential Sources of Drinking Water Contamination Index, EPA. www.epa.gov/safewater/swp/sources1.html

Best Management Practices

- Survey property to locate wells.

- Properly remove or seal and abandon identified wells following state rules or procedures.

(Source: Drinking Water from Forests and Grasslands: A Synthesis of Scientific Literature, United States Department of Agriculture Forest Service, General Technical Report SRS-39, September 2000, pp. 68-69)

Parking Lots
Concern for: Ground Water, Surface Water

Contaminants: Oil, gasoline, automotive fluids.

(Source: Drinking Water Academy Bulletin, Managing Storm Water Runoff to Prevent Contamination of Drinking Water, EPA 816-F-01-020, July 2001)

Drywells are UIC Class V wells. If drywells are used to manage parking lot runoff, then state and EPA UIC Class V rules apply to proper registration, operation, maintenance, and closure of these wells.

Best Management Practices

- Design to manage runoff appropriately – grassy swales, vegetated filter strips are options.
- Design to allow infiltration – permeable pavement such as concrete grid pavement is a good option.
- Sweep up litter and debris, especially around storm drains or other direct connections to surface water.

(Sources: Drinking Water Academy Bulletin, Managing Storm Water Runoff to Prevent Contamination of Drinking Water, EPA 816-F-01-020, July 2001. After the Storm: A Citizen's Guide to Understanding Storm Water, EPA 833-B-03-002, January 2003)

Aboveground Storage Tanks (ASTs)
Concern for: Surface Water *Contaminants:* Petroleum hydrocarbons, heating oil, other chemicals

Refer to State and Local Rules and Regulations to determine whether the state in which the AST is located has an Aboveground Storage Tank regulatory program. If a regulatory program exists, follow appropriate rules and guidance.

A Spill Prevention Control and Countermeasures (SPCC) Plan is required if the total amount of oil products on site in aboveground storage exceeds 1320 gallons, or if a single container exceeds a capacity of 660 gallons.

Best Management Practices

- ASTs should have spill and overfill prevention and leak detection.
- Secondary containment should be designed to contain the entire volume of the materials that can be stored in the AST.
- Tanks should be protected from corrosion.
- ASTs should be protected from physical damage and vandalism through use of guard posts and fencing, as necessary.
- Tanks should be operated, maintained, and closed appropriately.

(Source: New Mexico Environment Department Above Ground Storage Tank Program)

Underground Storage Tanks
Concern for: Ground Water, downgradient Surface Water
Contaminants: diesel, gasoline, heating oil, other chemicals

- EPA and State Regulations apply to the registration, operation, maintenance, and closure of USTs. Please contact the appropriate regulatory agency for information about the rules that apply to your tank:

  Idaho: Erik Sirs, Environmental Protection Agency Region 10
  208-378-5762, or sirs.erik@epa.gov

3. SECTION A-3: BLM WIND ENERGY DEVELOPMENT PROGRAM POLICIES AND BEST MANAGEMENT PRACTICES (BMPs)

The BLM's Wind Energy Development Program will establish a number of policies and BMPs, provided below, regarding the development of wind energy resources on BLM-administered public lands. The policies and BMPs will be applicable to all wind energy development projects on BLM-administered public lands. The policies address the administration of wind energy development activities, and the BMPs identify required mitigation measures that would need to be incorporated into project-specific Plans of Development (PODs) and right-of-way (ROW) authorization stipulations. Additional mitigation measures will be applied to individual projects, in the form of stipulations in the ROW authorization as appropriate, to address site-specific and species-specific issues.

These policies and BMPs were formulated through preparation of the Final Wind Energy PEIS (BLM 2005). The PEIS included detailed, comprehensive analysis of the potential impacts of wind energy development and relevant mitigation measures; reviews of existing, relevant mitigation guidance; and reviews of comments received during scoping and public review of the Draft PEIS.

Policies

- The BLM will not issue ROW authorizations for wind energy development on lands on which wind energy development is incompatible with specific resource values. Lands that will be excluded from wind energy site monitoring and testing and development include designated areas that are part of the National Landscape Conservation System (NLCS) (e.g., Wilderness Areas, Wilderness Study Areas, National Monuments, NCAs,[1] Wild and Scenic Rivers, and National Historic and Scenic Trails) and Areas of Critical Environmental Concern (ACECs). [2] Additional areas of land may be excluded from wind energy development on the basis of findings of resource impacts that cannot be mitigated and/or conflict with existing and planned multiple-use activities or land use plans.

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[1] Wind energy development is permitted in one NCA, the California Desert Conservation Area (CDCA), in accordance with the provisions of the *California Desert Conservation Area Plan 1980, as Amended* (BLM 1999).

[2] Although the MPDS developed for this PEIS (Section 2.2.1 and Appendix B) did not exclude all of these lands at the screening level, they will be excluded from wind energy development.

- To the extent possible, wind energy projects shall be developed in a manner that will not prevent other land uses, including minerals extraction, livestock grazing, recreational use, and other ROW uses.

- Entities seeking to develop a wind energy project on BLM-administered lands shall consult with appropriate federal, state, and local agencies regarding specific projects as early in the planning process as appropriate to ensure that all potential construction, operation, and decommissioning issues and concerns are identified and adequately addressed.

- The BLM will initiate government-to-government consultation with Indian Tribal governments whose interests might be directly and substantially affected by activities on BLM-administered lands as early in the planning process as appropriate to ensure that construction, operation, and decommissioning issues and concerns are identified and adequately addressed.

- Entities seeking to develop a wind energy project on BLM-administered lands, in conjunction with BLM Washington Office (WO) and Field Office (FO) staff, shall consult with the U.S. Department of Defense (DoD) regarding the location of wind power projects and turbine siting as early in the planning process as appropriate. This consultation shall occur concurrently at both the installation/field level and the Pentagon/BLM WO level. An interagency protocol agreement is being developed to establish a consultation process and to identify the scope of issues for consultation. Lands withdrawn for military purposes are under the administrative jurisdiction of the DoD or a military service and are not available for issuance of wind energy authorizations by the BLM.

- The BLM will consult with the U.S. Fish and Wildlife Service (USFWS) as required by Section 7 of the Endangered Species Act of 1973 (ESA). The specific consultation requirements will be determined on a project-by-project basis.

- The BLM will consult with the State Historic Preservation Office (SHPO) as required by Section 106 of the National Historic Preservation Act of 1966 (NHPA). The specific consultation requirements will be determined on a project-by-project basis. If programmatic Section 106 consultations have been conducted and are adequate to cover a proposed project, additional consultation may not be needed.

- Existing land use plans will be amended, as appropriate, to (1) adopt provisions of the BLM's Wind Energy Development Program, (2) identify land considered to be available for wind energy development, and (3) identify land that will not be available for wind energy development.

- The level of environmental analysis to be required under NEPA for individual wind power projects will be determined at the FO level. For many projects, it may be determined that a tiered environmental assessment (EA) is appropriate in lieu of an EIS.

To the extent that the PEIS addresses anticipated issues and concerns associated with an individual project, including potential cumulative impacts, the BLM will tier off of the decisions embedded in the PEIS and limit the scope of additional project-specific NEPA analyses. The site-specific NEPA analyses will include analyses of project site configuration and micrositing considerations, monitoring program requirements, and appropriate mitigation measures. In particular, the mitigation measures discussed in Chapter 5 of the PEIS may be consulted in determining site-specific requirements. Public involvement will be incorporated into all wind energy development projects to ensure that all concerns and issues are identified and adequately addressed. In general, the scope of the NEPA analyses will be limited to the proposed action on BLM-administered public lands; however, if access to proposed development on adjacent non-BLM-administered lands is entirely dependent on obtaining ROW access across BLM-administered public lands and there are no alternatives to that access, the NEPA analysis for the proposed ROW may need to assess the environmental effects from that proposed development. The BLM's analyses of ROW access projects may tier off of the PEIS to the extent that the proposed project falls within the scope of the PEIS analyses.

- Site-specific environmental analyses will tier from the PEIS and identify and assess any cumulative impacts that are beyond the scope of the cumulative impacts addressed in the PEIS.

- The Categorical Exclusion (CX) applicable to the issuance of short-term ROWs or land use authorizations may be applicable to some site monitoring and testing activities. The relevant CX, established for the BLM in the DOI Departmental Manual 516, Chapter 11, Sec. 11.5, E(19) (DOI 2004), encompasses "issuance of short-term (3 years or less) rights-of-way or land use authorizations for such uses as storage sites, apiary sites, and construction sites where the proposal includes rehabilitation to restore the land to its natural or original condition."

- The BLM will require financial bonds for all wind energy development projects on BLM-administered public lands to ensure compliance with the terms and conditions of the rights-of-way authorization and the requirements of applicable regulatory requirements, including reclamation costs. The amount of the required bond will be determined during the rights-of-way authorization process on the basis of site-specific and project-specific factors. The BLM may also require financial bonds for site monitoring and testing authorizations.

- Entities seeking to develop a wind energy project on BLM-administered public lands shall develop a project-specific Plan of Development (POD) that incorporates all BMPs and, as appropriate, the requirements of other existing and relevant BLM mitigation guidance, including the BLM's interim off-site mitigation guidance (BLM 2005a). Additional mitigation measures will be incorporated into the POD and into the ROW authorization as project stipulations, as needed, to address site-specific and species-specific issues. The POD will include a site plan showing the locations of

turbines, roads, power lines, other infrastructure, and other areas of short- and long-term disturbance.

- The BLM will incorporate management goals and objectives specific to habitat conservation for species of concern (e.g., sage-grouse), as appropriate, into the POD for proposed wind energy projects.

- The BLM will consider the visual resource values of the public lands involved in proposed wind energy development projects, consistent with BLM Visual Resource Management (VRM) policies and guidance. The BLM will work with the ROW applicant to incorporate visual design considerations into the planning and design of the project to minimize potential visual impacts of the proposal and to meet the VRM objectives of the area.

- Operators of wind power facilities on BLM-administered public lands shall consult with the BLM and other appropriate federal, state, and local agencies regarding any planned upgrades or changes to the wind facility design or operation. Proposed changes of this nature may require additional environmental analysis and/or revision of the POD.

- The BLM's Wind Energy Development Program will incorporate adaptive management strategies to ensure that potential adverse impacts of wind energy development are avoided (if possible), minimized, or mitigated to acceptable levels. The programmatic policies and BMPs will be updated and revised as new data regarding the impacts of wind power projects become available. At the project-level, operators will be required to develop monitoring programs to evaluate the environmental conditions at the site through all phases of development, to establish metrics against which monitoring observations can be measured, to identify potential mitigation measures, and to establish protocols for incorporating monitoring observations and additional mitigation measures into standard operating procedures and project-specific stipulations.

Best Management Practices (BMPs)

The BMPs will be adopted as required elements of project-specific PODs and/or as ROW authorization stipulations. They are categorized by development activity: site monitoring and testing, development of the POD, construction, operation, and decommissioning. The BMPs for development of the POD identify required elements of the POD needed to address potential impacts associated with subsequent phases of development.

Site Monitoring and Testing

- The area disturbed by installation of meteorological towers (i.e., footprint) shall be kept to a minimum.

- Existing roads shall be used to the maximum extent feasible. If new roads are necessary, they shall be designed and constructed to the appropriate standard.

- Meteorological towers shall not be located in sensitive habitats or in areas where ecological resources known to be sensitive to human activities (e.g., prairie grouse) are present. Installation of towers shall be scheduled to avoid disruption of wildlife reproductive activities or other important behaviors.

- Meteorological towers installed for site monitoring and testing shall be inspected periodically for structural integrity.

Plan of Development Preparation

General

- The BLM and operators shall contact appropriate agencies, property owners, and other stakeholders early in the planning process to identify potentially sensitive land uses and issues, rules that govern wind energy development locally, and land use concerns specific to the region.

- Available information describing the environmental and sociocultural conditions in the vicinity of the proposed project shall be collected and reviewed as needed to predict potential impacts of the project.

- The Federal Aviation Administration (FAA)-required notice of proposed construction shall be made as early as possible to identify any air safety measures that would be required.

- To plan for efficient use of the land, necessary infrastructure requirements shall be consolidated wherever possible, and current transmission and market access shall be evaluated carefully.

- The project shall be planned to utilize existing roads and utility corridors to the maximum extent feasible, and to minimize the number and length/size of new roads, lay-down areas, and borrow areas.

- A monitoring program shall be developed to ensure that environmental conditions are monitored during the construction, operation, and decommissioning phases. The monitoring program requirements, including adaptive management strategies, shall be established at the project level to ensure that potential adverse impacts of wind energy development are mitigated. The monitoring program shall identify the monitoring requirements for each environmental resource present at the site, establish metrics against which monitoring observations can be measured, identify potential mitigation measures, and establish protocols for incorporating monitoring observations and additional mitigation measures into standard operating procedures and BMPs.

- "Good housekeeping" procedures shall be developed to ensure that during operation the site will be kept clean of debris, garbage, fugitive trash or waste, and graffiti; to prohibit scrap heaps and dumps; and to minimize storage yards.

Wildlife and Other Ecological Resources

- Operators shall review existing information on species and habitats in the vicinity of the project area to identify potential concerns.

- Operators shall conduct surveys for federal and/or state-protected species and other species of concern (including special status plant and animal species) within the project area and design the project to avoid (if possible), minimize, or mitigate impacts to these resources.

- Operators shall identify important, sensitive, or unique habitats in the vicinity of the project and design the project to avoid (if possible), minimize, or mitigate impacts to these habitats (e.g., locate the turbines, roads, and ancillary facilities in the least environmentally sensitive areas; i.e., away from riparian habitats, streams, wetlands, drainages, or critical wildlife habitats).

- The BLM will prohibit the disturbance of any population of federal listed plant species.

- Operators shall evaluate avian and bat use of the project area and design the project to minimize or mitigate the potential for bird and bat strikes (e.g., development shall not occur in riparian habitats and wetlands). Scientifically rigorous avian and bat use surveys shall be conducted; the amount and extent of ecological baseline data required shall be determined on a project basis.

- Turbines shall be configured to avoid landscape features known to attract raptors, if site studies show that placing turbines there would pose a significant risk to raptors.

- Operators shall determine the presence of bat colonies and avoid placing turbines near known bat hibernation, breeding, and maternity/nursery colonies; in known migration corridors; or in known flight paths between colonies and feeding areas.

- Operators shall determine the presence of active raptor nests (i.e., raptor nests used during the breeding season). Measures to reduce raptor use at a project site (e.g., minimize road cuts, maintain either no vegetation or nonattractive plant species around the turbines) shall be considered.

- A habitat restoration plan shall be developed to avoid (if possible), minimize, or mitigate negative impacts on vulnerable wildlife while maintaining or enhancing habitat values for other species. The plan shall identify revegetation, soil stabilization, and erosion reduction measures that shall be implemented to ensure that all temporary use areas are restored. The plan shall require that restoration occur as soon as possible after

completion of activities to reduce the amount of habitat converted at any one time and to speed up the recovery to natural habitats.

- Procedures shall be developed to mitigate potential impacts to special status species. Such measures could include avoidance, relocation of project facilities or lay-down areas, and/or relocation of biota.

- Facilities shall be designed to discourage their use as perching or nesting substrates by birds. For example, power lines and poles shall be configured to minimize raptor electrocutions and discourage raptor and raven nesting and perching.

Visual Resources

- The public shall be involved and informed about the visual site design elements of the proposed wind energy facilities. Possible approaches include conducting public forums for disseminating information, offering organized tours of operating wind developments, and using computer simulation and visualization techniques in public presentations.

- Turbine arrays and turbine design shall be integrated with the surrounding landscape. Design elements to be addressed include visual uniformity, use of tubular towers, proportion and color of turbines, nonreflective paints, and prohibition of commercial messages on turbines.

- Other site design elements shall be integrated with the surrounding landscape. Elements to address include minimizing the profile of the ancillary structures, burial of cables, prohibition of commercial symbols, and lighting. Regarding lighting, efforts shall be made to minimize the need for and amount of lighting on ancillary structures.

Roads

- An access road siting and management plan shall be prepared incorporating existing BLM standards regarding road design, construction, and maintenance such as those described in the BLM 9113 Manual (BLM 1985) and the *Surface Operating Standards for Oil and Gas Exploration and Development* (RMRCC 1989) (i.e., the Gold Book).

Ground Transportation

- A transportation plan shall be developed, particularly for the transport of turbine components, main assembly cranes, and other large pieces of equipment. The plan shall consider specific object sizes, weights, origin, destination, and unique handling requirements and shall evaluate alternative transportation approaches. In addition, the process to be used to comply with unique state requirements and to obtain all necessary permits shall be clearly identified.

- A traffic management plan shall be prepared for the site access roads to ensure that no hazards would result from the increased truck traffic and that traffic flow would not be adversely impacted. This plan shall incorporate measures such as informational signs, flaggers when equipment may result in blocked throughways, and traffic cones to identify any necessary changes in temporary lane configuration.

Noise

- Proponents of a wind energy development project shall take measurements to assess the existing background noise levels at a given site and compare them with the anticipated noise levels associated with the proposed project.

Noxious Weeds and Pesticides

- Operators shall develop a plan for control of noxious weeds and invasive species, which could occur as a result of new surface disturbance activities at the site. The plan shall address monitoring, education of personnel on weed identification, the manner in which weeds spread, and methods for treating infestations. The use of certified weed-free mulching shall be required. If trucks and construction equipment are arriving from locations with known invasive vegetation problems, a controlled inspection and cleaning area shall be established to visually inspect construction equipment arriving at the project area and to remove and collect seeds that may be adhering to tires and other equipment surfaces.

- If pesticides are used on the site, an integrated pest management plan shall be developed to ensure that applications would be conducted within the framework of BLM and DOI policies and entail only the use of EPA-registered pesticides. Pesticide use shall be limited to nonpersistent, immobile pesticides and shall only be applied in accordance with label and application permit directions and stipulations for terrestrial and aquatic applications.

Cultural/Historic Resources

- The BLM will consult with Indian Tribal governments early in the planning process to identify issues regarding the proposed wind energy development, including issues related to the presence of cultural properties, access rights, disruption to traditional cultural practices, and impacts to visual resources important to the Tribe(s).

- The presence of archaeological sites and historic properties in the area of potential effect shall be determined on the basis of a records search of recorded sites and properties in the area and/or, depending on the extent and reliability of existing information, an archaeological survey. Archaeological sites and historic properties present in the area of potential effect shall be reviewed to determine whether they meet the criteria of eligibility for listing on the *National Register of Historic Places* (NRHP).

- When any rights-of-way application includes remnants of a National Historic Trail, is located within the viewshed of a National Historic Trail's designated centerline, or includes or is within the viewshed of a trail eligible for listing on the NRHP, the operator shall evaluate the potential visual impacts to the trail associated with the proposed project and identify appropriate mitigation measures for inclusion as stipulations in the POD.

- If cultural resources are present at the site, or if areas with a high potential to contain cultural material have been identified, a cultural resources management plan (CRMP) shall be developed. This plan shall address mitigation activities to be taken for cultural resources found at the site. Avoidance of the area is always the preferred mitigation option. Other mitigation options include archaeological survey and excavation (as warranted) and monitoring. If an area exhibits a high potential, but no artifacts were observed during an archaeological survey, monitoring by a qualified archaeologist could be required during all excavation and earthmoving in the high-potential area. A report shall be prepared documenting these activities. The CRMP also shall (1) establish a monitoring program, (2) identify measures to prevent potential looting/vandalism or erosion impacts, and (3) address the education of workers and the public to make them aware of the consequences of unauthorized collection of artifacts and destruction of property on public land.

Paleontological Resources

- Operators shall determine whether paleontological resources exist in a project area on the basis of the sedimentary context of the area, a records search for past paleontological finds in the area, and/or, depending on the extent of existing information, a paleontological survey.

- If paleontological resources are present at the site, or if areas with a high potential to contain paleontological material have been identified, a paleontological resources management plan shall be developed. This plan shall include a mitigation plan for collection of the fossils; mitigation could include avoidance, removal of fossils, or monitoring. If an area exhibits a high potential but no fossils were observed during survey, monitoring by a qualified paleontologist could be required during all excavation and earthmoving in the sensitive area. A report shall be prepared documenting these activities. The paleontological resources management plan also shall (1) establish a monitoring program, (2) identify measures to prevent potential looting/vandalism or erosion impacts, and (3) address the education of workers and the public to make them aware of the consequences of unauthorized collection of fossils on public land.

Hazardous Materials and Waste Management

- Operators shall develop a hazardous materials management plan addressing storage, use, transportation, and disposal of each hazardous material anticipated to be used at the site. The plan shall identify all hazardous materials that would be used, stored, or transported at the site. It shall establish inspection procedures, storage requirements, storage

quantity limits, inventory control, nonhazardous product substitutes, and disposition of excess materials. The plan shall also identify requirements for notices to federal and local emergency response authorities and include emergency response plans.

- Operators shall develop a waste management plan identifying the waste streams that are expected to be generated at the site and addressing hazardous waste determination procedures, waste storage locations, waste-specific management and disposal requirements, inspection procedures, and waste minimization procedures. This plan shall address all solid and liquid wastes that may be generated at the site.

- Operators shall develop a spill prevention and response plan identifying where hazardous materials and wastes are stored on site, spill prevention measures to be implemented, training requirements, appropriate spill response actions for each material or waste, the locations of spill response kits on site, a procedure for ensuring that the spill response kits are adequately stocked at all times, and procedures for making timely notifications to authorities.

Storm Water

- Operators shall develop a storm water management plan for the site to ensure compliance with applicable regulations and prevent off-site migration of contaminated storm water or increased soil erosion.

Human Health and Safety

- A safety assessment shall be conducted to describe potential safety issues and the means that would be taken to mitigate them, including issues such as site access, construction, safe work practices, security, heavy equipment transportation, traffic management, emergency procedures, and fire control.

- A health and safety program shall be developed to protect both workers and the general public during construction, operation, and decommissioning of a wind energy project. Regarding occupational health and safety, the program shall identify all applicable federal and state occupational safety standards; establish safe work practices for each task (e.g., requirements for personal protective equipment and safety harnesses; Occupational Safety and Health Administration [OSHA] standard practices for safe use of explosives and blasting agents; and measures for reducing occupational electric and magnetic fields [EMF] exposures); establish fire safety evacuation procedures; and define safety performance standards (e.g., electrical system standards and lightning protection standards). The program shall include a training program to identify hazard training requirements for workers for each task and establish procedures for providing required training to all workers. Documentation of training and a mechanism for reporting serious accidents to appropriate agencies shall be established.

- Regarding public health and safety, the health and safety program shall establish a safety zone or setback for wind turbine generators from residences and occupied buildings, roads, rights-of-ways, and other public access areas that is sufficient to prevent accidents resulting from the operation of wind turbine generators. It shall identify requirements for temporary fencing around staging areas, storage yards, and excavations during construction or decommissioning activities. It shall also identify measures to be taken during the operation phase to limit public access to hazardous facilities (e.g., permanent fencing would be installed only around electrical substations, and turbine tower access doors would be locked).

- Operators shall consult with local planning authorities regarding increased traffic during the construction phase, including an assessment of the number of vehicles per day, their size, and type. Specific issues of concern (e.g., location of school bus routes and stops) shall be identified and addressed in the traffic management plan.

- If operation of the wind turbines is expected to cause significant adverse impacts to nearby residences and occupied buildings from shadow flicker, low-frequency sound, or EMF, site-specific recommendations for addressing these concerns shall be incorporated into the project design (e.g., establishing a sufficient setback from turbines).

- The project shall be planned to minimize electromagnetic interference (EMI) (e.g., impacts to radar, microwave, television, and radio transmissions) and comply with Federal Communications Commission [FCC] regulations. Signal strength studies shall be conducted when proposed locations have the potential to impact transmissions. Potential interference with public safety communication systems (e.g., radio traffic related to emergency activities) shall be avoided.

- The project shall be planned to comply with FAA regulations, including lighting regulations, and to avoid potential safety issues associated with proximity to airports, military bases or training areas, or landing strips.

- Operators shall develop a fire management strategy to implement measures to minimize the potential for a human-caused fire.

Construction

General

- All control and mitigation measures established for the project in the POD and the resource-specific management plans that are part of the POD shall be maintained and implemented throughout the construction phase, as appropriate.

- The area disturbed by construction and operation of a wind energy development project (i.e., footprint) shall be kept to a minimum.

- The number and size/length of roads, temporary fences, lay-down areas, and borrow areas shall be minimized.

- Topsoil from all excavations and construction activities shall be salvaged and reapplied during reclamation.

- All areas of disturbed soil shall be reclaimed using weed-free native grasses, forbs, and shrubs. Reclamation activities shall be undertaken as early as possible on disturbed areas.

- All electrical collector lines shall be buried in a manner that minimizes additional surface disturbance (e.g., along roads or other paths of surface disturbance). Overhead lines may be used in cases where burial of lines would result in further habitat disturbance.

- Operators shall identify unstable slopes and local factors that can induce slope instability (such as groundwater conditions, precipitation, earthquake activities, slope angles, and the dip angles of geologic strata). Operators also shall avoid creating excessive slopes during excavation and blasting operations. Special construction techniques shall be used where applicable in areas of steep slopes, erodible soil, and stream channel crossings.

- Erosion controls that comply with county, state, and federal standards shall be applied. Practices such as jute netting, silt fences, and check dams shall be applied near disturbed areas.

Wildlife

- Guy wires on permanent meteorological towers shall be avoided, however, may be necessary on temporary meteorological towers installed during site monitoring and testing.

- In accordance with the habitat restoration plan, restoration shall be undertaken as soon as possible after completion of construction activities to reduce the amount of habitat converted at any one time and to speed up the recovery to natural habitats.

- All construction employees shall be instructed to avoid harassment and disturbance of wildlife, especially during reproductive (e.g., courtship and nesting) seasons. In addition, pets shall not be permitted on site during construction.

Visual Resources

- Operators shall reduce visual impacts during construction by minimizing areas of surface disturbance, controlling erosion, using dust suppression techniques, and restoring exposed soils as closely as possible to their original contour and vegetation.

Roads

- Existing roads shall be used, but only if in safe and environmentally sound locations. If new roads are necessary, they shall be designed and constructed to the appropriate standard and be no higher than necessary to accommodate their intended functions (e.g., traffic volume and weight of vehicles). Excessive grades on roads, road embankments, ditches, and drainages shall be avoided, especially in areas with erodible soils. Special construction techniques shall be used, where applicable. Abandoned roads and roads that are no longer needed shall be recontoured and revegetated.

- Access roads and on-site roads shall be surfaced with aggregate materials, wherever appropriate.

- Access roads shall be located to follow natural contours and minimize side hill cuts.

- Roads shall be located away from drainage bottoms and avoid wetlands, if practicable.

- Roads shall be designed so that changes to surface water runoff are avoided and erosion is not initiated.

- Access roads shall be located to minimize stream crossings. All structures crossing streams shall be located and constructed so that they do not decrease channel stability or increase water velocity. Operators shall obtain all applicable federal and state permits.

- Existing drainage systems shall not be altered, especially in sensitive areas such as erodible soils or steep slopes. Potential soil erosion shall be controlled at culvert outlets with appropriate structures. Catch basins, roadway ditches, and culverts shall be cleaned and maintained regularly.

Ground Transportation

- Project personnel and contractors shall be instructed and required to adhere to speed limits commensurate with road types, traffic volumes, vehicle types, and site-specific conditions, to ensure safe and efficient traffic flow and to reduce wildlife collisions and disturbance and airborne dust.

- Traffic shall be restricted to the roads developed for the project. Use of other unimproved roads shall be restricted to emergency situations.

- Signs shall be placed along construction roads to identify speed limits, travel restrictions, and other standard traffic control information. To minimize impacts on local commuters, consideration shall be given to limiting construction vehicles traveling on public roadways during the morning and late afternoon commute time.

Air Emissions

- Dust abatement techniques shall be used on unpaved, unvegetated surfaces to minimize airborne dust.

- Speed limits (e.g., 25 mph [40 km/h]) shall be posted and enforced to reduce airborne fugitive dust.

- Construction materials and stockpiled soils shall be covered if they are a source of fugitive dust.

- Dust abatement techniques shall be used before and during surface clearing, excavation, or blasting activities.

Excavation and Blasting Activities

- Operators shall gain a clear understanding of the local hydrogeology. Areas of groundwater discharge and recharge and their potential relationships with surface water bodies shall be identified.

- Operators shall avoid creating hydrologic conduits between two aquifers during foundation excavation and other activities.

- Foundations and trenches shall be backfilled with originally excavated material as much as possible. Excess excavation materials shall be disposed of only in approved areas or, if suitable, stockpiled for use in reclamation activities.

- Borrow material shall be obtained only from authorized and permitted sites. Existing sites shall be used in preference to new sites.

- Explosives shall be used only within specified times and at specified distances from sensitive wildlife or streams and lakes, as established by the BLM or other federal and state agencies.

Noise

- Noisy construction activities (including blasting) shall be limited to the least noise-sensitive times of day (i.e., daytime only between 7 a.m. and 10 p.m.) and weekdays.

- All equipment shall have sound-control devices no less effective than those provided on the original equipment. All construction equipment used shall be adequately muffled and maintained.

- All stationary construction equipment (i.e., compressors and generators) shall be located as far as practicable from nearby residences.

- If blasting or other noisy activities are required during the construction period, nearby residents shall be notified in advance.

Cultural and Paleontological Resources

- Unexpected discovery of cultural or paleontological resources during construction shall be brought to the attention of the responsible BLM authorized officer immediately. Work shall be halted in the vicinity of the find to avoid further disturbance to the resources while they are being evaluated and appropriate mitigation measures are being developed.

Hazardous Materials and Waste Management

- Secondary containment shall be provided for all on-site hazardous materials and waste storage, including fuel. In particular, fuel storage (for construction vehicles and equipment) shall be a temporary activity occurring only for as long as is needed to support construction activities.

- Wastes shall be properly containerized and removed periodically for disposal at appropriate off-site permitted disposal facilities.

- In the event of an accidental release to the environment, the operator shall document the event, including a root cause analysis, appropriate corrective actions taken, and a characterization of the resulting environmental or health and safety impacts. Documentation of the event shall be provided to the BLM authorized officer and other federal and state agencies, as required.

- Any wastewater generated in association with temporary, portable sanitary facilities shall be periodically removed by a licensed hauler and introduced into an existing municipal sewage treatment facility. Temporary, portable sanitary facilities provided for construction crews shall be adequate to support expected on-site personnel and shall be removed at completion of construction activities.

Public Health and Safety

- Temporary fencing shall be installed around staging areas, storage yards, and excavations during construction to limit public access.

Operation

General

- All control and mitigation measures established for the project in the POD and the resource-specific management plans that are part of the POD shall be maintained and implemented throughout the operational phase, as appropriate. These control and mitigation measures shall be reviewed and revised, as needed, to address changing conditions or requirements at the site, throughout the operational phase. This adaptive management approach would help ensure that impacts from operations are kept to a minimum.

- Inoperative turbines shall be repaired, replaced, or removed in a timely manner. Requirements to do so shall be incorporated into the due diligence provisions of the rights-of-way authorization. Operators will be required to demonstrate due diligence in the repair, replacement, or removal of turbines; failure to do so could result in termination of the rights-of-way authorization.

Wildlife

- Employees, contractors, and site visitors shall be instructed to avoid harassment and disturbance of wildlife, especially during reproductive (e.g., courtship and nesting) seasons. In addition, any pets shall be controlled to avoid harassment and disturbance of wildlife.

- Observations of potential wildlife problems, including wildlife mortality, shall be reported to the BLM authorized officer immediately.

Ground Transportation

- Ongoing ground transportation planning shall be conducted to evaluate road use, minimize traffic volume, and ensure that roads are maintained adequately to minimize associated impacts.

Monitoring Program

- Site monitoring protocols defined in the POD shall be implemented. These will incorporate monitoring program observations and additional mitigation measures into standard operating procedures and BMPs to minimize future environmental impacts.

- Results of monitoring program efforts shall be provided to the BLM authorized officer.

Public Health and Safety

- Permanent fencing shall be installed and maintained around electrical substations, and turbine tower access doors shall be locked to limit public access.

- In the event an installed wind energy development project results in EMI, the operator shall work with the owner of the impacted communications system to resolve the problem. Additional warning information may also need to be conveyed to aircraft with onboard radar systems so that echoes from wind turbines can be quickly recognized.

Decommissioning

General

- Prior to the termination of the rights-of-way authorization, a decommissioning plan shall be developed and approved by the BLM. The decommissioning plan shall include a site reclamation plan and monitoring program.

- All management plans, BMPs, and stipulations developed for the construction phase shall be applied to similar activities during the decommissioning phase.

- All turbines and ancillary structures shall be removed from the site.

- Topsoil from all decommissioning activities shall be salvaged and reapplied during final reclamation.

- All areas of disturbed soil shall be reclaimed using weed-free native shrubs, grasses, and forbs.

- The vegetation cover, composition, and diversity shall be restored to values commensurate with the ecological setting.

APPENDIX B – COEUR D'ALENE DISTRICT ROAD AND ELK GUIDELINES

APPENDIX B: COEUR D'ALENE DISTRICT ROAD GUIDELINES

INTRODUCTION

The general guidelines in this appendix are from the 1989 Emerald Empire Management Framework Plan, and only apply to current management (Alternative A). Appendix A contains best management practices (BMPs) that would be applied under Alternatives B, C, and D. The following general guidelines were developed to provide an adequate useable road system while protecting the environment. This expands and supplements the basic guidelines and minimum requirements of the BLM manual; Idaho Department of Water Resources (IDWR) (stream channel protection); Idaho Department of Health and Welfare; Division of Environment (Forest Practices Regulations); and Corps of Engineers 404 Regulations. These guidelines must be flexible, and any deviations would be noted and assessed in the environmental assessment process.

ROAD PLANNING

Road planning in the district would be based on the need to provide an adequate road system to effectively manage the public lands while protecting the resources of the areas. The following guidelines are designed to meet these objectives:

- All roads would be planned and developed in cooperation with other land owners. Plans would be made to serve tributary areas of drainages or ownership block so that only the minimum amount of road necessary to meet management objectives would be planned. Road planning would take into account the long range road needs, expected duration of use of the road, the management objectives, and other policy constraints.

- The road planner must be able to recognize potential impacts to resource values, i.e., silviculture, soils, water, fisheries, wildlife, visual, recreation, etc., and will consult with appropriate specialists when problems are suspected.

- The planned location and design of roads would minimize detrimental impacts on the other resources •of the area. Roads will be planned to avoid sensitive and important areas such as wetlands; floodplains; riparian areas; stream zones; big game use areas; threatened and endangered resource habitat areas; cultural or historical sites; scenic views; mass failure hazard areas; etc. Where it is not practical to totally avoid these areas and it is determined the road is necessary to meet management objectives, mitigation would be included in the design of the road.

- Use of existing roads would be favored over construction of new roads when continued use or reconstruction would result in meeting management objectives without major cost increases while causing the least long run impact to the site.

- In the planning stage, temporary or permanent closure will be considered for all dead end roads or roads with an expected duration of use of 5 years or less.

- Plan roads to be located on natural benches or ridges away from stream courses. Consider using the steepest permissible pitches and grades at stream crossings to avoid closely paralleling the stream for long distances. Planned stream crossings would be kept to a minimum.

- In planning a road system in a municipal watershed, the major objective would be to maintain or improve the quality of domestic water.

ROAD DESIGN AND SPECIFICATIONS

Roads would be designed to meet management objectives using the following guidelines:

– Roads would be designed to be no wider than necessary to accommodate the anticipated use.

– Where feasible, minimize cuts and fills by designing the road to fit the natural terrain.

– Balanced cut and fill road designs would be used where practical. Where not practical, waste areas would be designed so excess material would be placed in stable areas and borrow pits would be designed to minimize impacts to other resource values.

– When roads are planned on slopes exceeding 60 percent, they would be designed so that the road is on a full bench section. Excess material would be placed in stable areas.

– Design roads to leave vegetation that would screen streams, important wildlife areas, and areas of visual contrast (see Buffer Guidelines and Elk Coordinating Guidelines). Vegetation removal would not extend further than the fill limits or 0.9 meters (3 feet) beyond the excavation limits.

– Stream crossings would be selected and designed to involve the least disturbance to banks and existing channels. In doing so, approaches would be designed as near to a right angle with the stream as possible.

– On roads with a life span longer than ***5*** years, bridges or culverts would be designed for all natural water courses. No bridge or culvert should constrict the natural channel.

– Culverts in natural drainage ways would be oriented to the stream channel and would be _j - designed, using half rounds or downspouts, to carry water beyond fills. Protection measures such as riprap would be used to protect streambanks and fills at upstream and downstream ends of culverts and bridges from erosion.

– Relief culverts would be designed with a minimum slope of one percent with sediment catch basins at the culvert mouth. Drainage structures on streams identified as having spawning potential or important fisheries would provide for fish passage. Bridges or natural bottomed culverts are preferable, but if standard culverts are used, they would be designed to meet or exceed Idaho Department of Water Resources (IDWR) regulations and Idaho Fish and Game (IF&G) criteria.

– Road drainage systems would be designed to avoid direct sediment discharge into streams. Use the U.S. Forest Service "Guide for Controlling Sediment from-Secondary Logging Roads" to assist in drainage design.

– Design roads to drain naturally, where possible. Roadside ditches and relief culverts would be designed whenever reliance on natural drainage would not protect the running surface or excavation and embankment areas.

– Soil properties and geologic conditions along the planned road route will be determined before road design begins. These properties and conditions would be included in the design.

– Slash disposal areas and features would be included in the design. Slash and debris may windrowed along the toe of the fill if it is outside the stream protection zone and poses no barriers to wildlife.

– Soil surface stabilization, i.e., riprap, seeding with grasses, or mulching would be designed for all areas where soils are disturbed, especially on large fill areas.

– When roads must cross mass failure hazard areas such as slumps and scarps, the road design must provide for positive stabilization of the rood across the hazard area. Large fill and unstable areas would be protected by surface drainage diversion systems.

– When roads must cross poorly drained or wet soils, the road prism would be designed with a structurally adequate subbase to support expected traffic loadings and with an adequate drainage system.

– Design surface treatments (i.e., rock surfacing) for roads constructed from fine plastic soil materials to prevent rutting in wet conditions and dust problems in dry seasons if road use is planned during these times.

– Design landing areas into the road system. Landings would be designed to be of minimum size necessary and located on stable areas outside stream buffer zones.

ROAD CONSTRUCTION

Roads would be constructed utilizing good construction practices. They would be designed to minimize impacts on the area and include incorporation of the following guidelines:

– Earthwork on roads would not be done when soils are saturated or frozen or during wet periods when material can be eroded and deposited outside the roadway corridor. On cohesive soils, no construction would be done when the soils are in a liquid state or in the upper one-third range of the plastic state.

– Before the end of an operating season and before winter or spring erosion periods, the road segments would be surface bladed or cross drained as needed, and drainage structures would be installed. Other surface protection measures would be taken to minimize erosion from the road corridor.

– During construction, road fill material would be compacted to reduce the entry of water; minimize erosion, and reduce settling. No significant amount of woody material would be incorporated into fills.

– In rippable materials, roads would be constructed with no overhanging banks. Any trees that would be a hazard would be felled concurrent with the construction operation.

– Potentially unstable or erodible material exposed (i.e., road embankments) or generated (i.e., waste piles) during construction would be stabilized as soon as feasible by seeding, compacting, riprapping, benching, mulching, or other suitable moans.

– Drainage structures would be installed as soon as feasible. If not feasible, cross drains would be installed.

– All drainage ways would be cleared of debris generated during construction.

ELK HABITAT COORDINATING REQUIREMENTS

Early in 1976, wildlife biologists in northern Idaho representing the Idaho Fish and Game Department, U.S. Forest Service, Bureau of Land Management, and the University of Idaho began development of a procedure for coordination of silvicultural activities with elk habitat needs similar to that developed by Black, Scherzinger, and Thomas (1976) for the Blue Mountains of Oregon and Washington, but adapted to the habitat needs of Rocky Mountain elk in northern Idaho. In July 1977, a 3-day meeting of those biologists was held at the Idaho Panhandle National Forests Supervisor's Office in Coeur d'Alene, Idaho. Guidelines were developed at this meeting, utilizing research data from literature reviews, personal communication with elk research biologists, and discussions between participants. The resulting guidelines contained the best information available on the effects, relationships, and coordination of silvicultural practices and elk habitat management for the northern Idaho forests. These guidelines would, of necessity, be updated and modified as additional data becomes available.

The objective of these guidelines is to provide forest land managers in northern Idaho a means by which to assess and evaluate the effects of silvicultural prescriptions, timber harvest techniques, and other land management decisions on Rocky Mountain elk and their habitat. It is not meant to provide all the answers for optimization of elk habitat but rather to display cause and effect relationships and to provide alternatives for consideration in land use decision making.

Within the guidelines are definitions of terms used to describe elk habitat, some of which are in the glossary, and descriptions of seasonal habitat requirements of elk. Following is the body of the guidelines listing points of concern of timber harvest methods; slash disposal methods, etc.; research findings on the points specified; and recommendations for each point of concern.

RECOMMENDATIONS FOR COORDINATING SILVICULTURE WITH ELK HABITAT REQUIREMENTS

TIMBER HARVEST

General

The action of removing coniferous vegetation from a given area by logging procedures has the effect of altering the balance between cover and forage areas and disrupting movements and distribution. Since the forage:cover ratio is used to describe optimum elk habitat, forest managers must understand that the balance between these two entities by habitat type will govern the level of possible use of tie area by elk. Utilizing the broad forage:cover ratio concept put forth for the Blue Mountains by Black et al. (1976), these recommendations adapt that concept to northern Idaho and go one step further by providing forage:cover ratios by habitat types.

Silvicultural Methods

Point of Concern

The method of timber harvest selected for a given area will determine the resultant forage produced within the capability of the site, it then follows that the utilization of the various harvest methods with regard to size, degree, and arrangement of the cut will govern the expected elk use after the logging action.

Research Findings

Irwin (1976) reported that the method of harvest will influence the resultant forb and shrub production on the harvest areas, with clearcut sites producing the most palatable forage and partial cuts the least.

Allen et al. (1976) recommend small openings "...but cutting units as large as 100 acres may be acceptable in some circumstances." A management plan for elk on the Flathead National Forest indicates no clearcut to be over 35 acres in size-(Baglien and Biggins, 1976). Hershey and Leege (1976) found 80 percent of all elk groups (122 observations) to use portions of clearcut within 46 meters (150 feet) of the timbered edge. They further indicate that elk were more apt to use portions of clearcuts farther from the edge if "...scattered clumps of trees remained standing within the logged area."

Lyon (1976) analyzed pellet group distributions and found heavier elk use in openings in the 10 to 40 acre range, especially if slash was adequately disposed of. In southwestern Oregon, Harper (1969) found elk use of openings to decrease sharply at distances greater than 274 meters (300 yards) from the edge.

Reynolds (1962, 1966) found that forage sites created by harvesting timber have decreased elk use at distances beyond 183 meters (600 feet) from the edge of cover. Utilizing the foregoing research, Black et al. (1976) specified that in order to qualify under optimum habitat arrangements, no forage area should be wider than 366 meters (1,200 feet).

Associated with the size, type, and shape of cut are the leave areas which will remain undisturbed until the vegetation of adjacent cutover areas qualifies as hiding cover. Black at al. (1976) stated that the optimum size for thermal cover units on summer and spring-fall range is 30 to 60 acres.

Reynolds (1966) found that elk used the area that extended 137 meters (450 feet) into the forest from the forest edge. With this information, Black at al. (1976) prescribed hiding cover patches of between 243 meters and 488 meters (800 and 1,600 feet) in width.

Recommendations

(Variations from literature have been made to adapt to the northern Idaho situation.)

– Any silvicultural method which changes the description of an area from cover to forage, according to our definition, should be confined to an area with a width of from 243 meters to 305 meters (800 to 1,000 feet) that is bordered on all sides by cover of not less than 243 meters (800 feet) width.

– When seeking to provide maximum forage for elk through a harvest method, choose the treatment which yields the highest Relative Value Index for forage production.

– A 3,800-acre home range should be the management unit in which an elk's seasonal requirements will be satisfied. Of the total cover requirement for a given unit, one-half should be hiding cover, one-fourth thermal cover, and one-fourth any combination of hiding and thermal cover. One-fourth of all hiding and thermal cover should also qualify as security cover.

SLASH DISPOSAL METHODS

Point of Concern

The accumulation and treatment of logging debris or slash is inherent with any timber harvest action. This byproduct of timber harvest has the potential to affect elk behavior and movement both in the cut area and adjoining uncut area. The method of disposal utilized will affect the vegetative response towards elk forage production.

Research Findings

Lyon (1976) stated that elk use diminished when slash inside the opening exceeded 0.5 meters (1.5 feet) in depth and dead and down material outside the opening exceeded 0.5 meters (1.5 feet). The treatment of the slash, be it seasonal broadcase burning; handpiling and burning; or lop and scatter, will affect the degree and amount of elk forage produced on the treatment site, assuming the potential does exist (Irwin 1976).

Recommendations

– In order to insure the highest elk use possible in logged areas, particularly forage areas, slash depth should not exceed 0.5 meters (1.5 feet).

– When developing an area with elk forage production as a consideration, use a slash disposal treatment which will yield the highest value for forage production.

TIMING AND DURATION OF TIMBER HARVEST

Point of Concern

The season of the year and the length of time during any one year that logging operations disturb areas inhabited by elk influence normal use patterns of the animals. It is important that considerations regarding conflicts between elk use and logging activities be realized and the two be coordinated to mitigate adverse impacts resulting from the displacement of the animals.

Research Findings

Lyon (1975) stated that displacement of elk, which is considered temporary, has been detected as far as 4 miles from the area of summer logging activity. Ward (1976) found that elk preferred to be at least 0.5 miles from logging activity.

Recommendations

– In that sales are currently designed to run the shortest period of time, it is necessary to work within the specified time frame by designating compartments and order of logging through sale layout and contract stipulations to eliminate random logging over the entire area.

– Where feasible, logging would not be conducted on areas at the time of year when elk would normally be using them. For example, refrain from logging winter ranges during the winter months.

– Within the plan for timber sales on elk summer range, provide adjacent security areas for the animals to move into during periods of timber harvest or road building activity.

SPECIAL HABITAT COMPONENTS

Point of Concern

Within the spring, summer, and fall ranges of elk there are certain special physical components or habitat areas which receive an inordinate amount of elk use. These include salt licks, wallows, established travel routes, and calving areas. The conservation and protection of these areas is considered to be important in preserving the integrity of the seasonal habitat.

Research Findings

Moist Sites

In the findings and recommendations of the Montana Cooperative Elk-Logging Study (Allen et al. 1977), the importance of moist sites in elk summer range is stressed. In Montana, most of the important wet sites were located within the Abies lasiocarpa habitat series (Pfister 1976); however, these components in northern Idaho may also be found in those types within the pachistima union (Daubenmire 1968). These sites are found in drainage heads bordering streams or marshy meadow; moist swales; or benches studies indicate these sites are important as food sources prior to the breeding season and during the reproductive period. They also provide thermal and security cover.

Wallows

Elk wallows are shallow pools normally located in boggy areas or where water seeps from a slope into a flat bench. Murie (1951) indicates its function is to soothe the rutting bull by cooling the body and serving as an outlet for pent up energy. Struhsaker (1967) speculated that "...the function of wallowing is to facilitate the location of bulls by one another." Cow elk use the wallows in similar fashion to the bulls in later summer. Often the wallows remain as clear pools during the spring and early summer to provide a water source for elk and other species. Wallows are a preferred habitat component for elk and are used to varying degrees when available.

Licks

Elk utilize mineral licks when available in northern Idaho, most of these licks are the sites of past and current salting programs (either for game or livestock) or where naturally salty water- and/or soil is present. Dalke et al. (1965) analyzed the water from natural salt licks in north-central Idaho and found that sodium seemed to be the element attracting elk. They found elk use of licks to occur primarily between the third week in April and late August. Peak use occurred during the second and third weeks of June. They also reported that salt licks within succulent herbaceous areas were used considerably more than licks in shrubby areas.

Murie (1951) states "...that wild game species need salt is open to serious question...wild animals are adapted to natural food sources." However, Botkin et al. (1973) suggests that the availability of sodium on Isle Royale, Lake Superior, controls the moose population. So the question of how critically elk need these areas remains unanswered; however, as with wallows, licks are heavily used when available and we therefore believe in protecting them from disturbance.

Rub Areas

Prior to and during the rut, bull elk rub their antlers, removing the velvet and thus finalizing the hardening process. As the rut progresses, the rubbing and fighting of small trees is intensified. Some discussion has occurred over the preference for specific areas for use of "rub trees" by bulls during rutting season. It is our opinion that such areas coincide with preferred habitat components for other needs such as thermal and hiding cover and wallows or licks.

Calving Areas

The term "calving area" is given to those areas which the cow elk traditionally utilize for giving birth. These areas, though often hard to positively identify, have a mixture of components which make them attractive to the elk for calving purposes. Thomas et al, (1976) provided the following capsule description of probably calving habitat:

"In short, calving grounds are located in the transition zone where escape and thermal cover in the form of forests exist for the cows; where there is hiding cover in the form of shrubs or dead and down logs, etc., for relatively immobile newborn calves; where succulent forage is available for the lactating female; where water is within 305 meters (1,000 feet); and where the terrain is gently, allowing easy movement of the cow immediately before and after parturition."

Travel Lanes

Within forested areas, elk move from forage to cover areas and from one seasonal range to another along selected and traditional routes. Logging activities tend to disrupt or block these travel routes resulting in displacement or elimination of elk from formerly utilized habitats (Leege 1976 and Lyon 1975).

Recommendations

– Whenever these special components are encountered in connection with a timber sale action or questions arise as to their occurrence or importance, a wildlife biologist must evaluate these on a case-by-case basis.

– In regard to licks and wallows, these should be preserved and buffered from disturbance by a minimum of 1.5 sight distances.

– Whenever the existence of calving habitat is confirmed or expected, it should be reviewed by the wildlife biologist as it is considered to be an extremely important habitat component.

– Upon identifying the travel lanes, the following points should be considered: 1) maintain known travel routes in continuous hiding or thermal cover for at least three sight distances wide; and 2) travel lanes should be provided for saddles and ridges as these are points of heavy travel flow by the animals. These should be tied to forage and cover areas.

– If an area within a proposed timber sale exhibits a high density of "rub trees", an effort should be made to preserve that area or areas of similar physical and vegetative makeup within the home range.

– No activities associated with timber harvest or pre-sale activities such as road building can be permitted in calving areas from the period of May 1 through July 15 (Roberts 1974).

ROAD EFFECTS

That elk are adversely affected by roads is well documented in literature. Such adverse effects vary from disturbance due to presence of vehicular travel to increasing hunter access, thus allowing over harvesting of elk in localized areas.

Habitat Use and Roads

Studies indicate that elk do not frequent areas adjacent to roads in proportion to similar habitat in undisturbed areas. Hershey and Leege (1976) and Ward (1976) found elk use to be disrupted within .4 kilometers (.25 miles) on either side of a road. Coggins (1976) reported high road density and constant vehicle travel excluded elk from many areas of escape cover. Studies of the effects of roads on elk use by Perry and Overly (1976) found that generally, roads significantly reduced elk use of adjacent habitat below average levels.

Data indicate that elk respond less to constant non-stopping vehicular travel (usually associated with main roads) than to periodic slow vehicle use where vehicles stop and human activity is associated with it (Ward, 1976; Burbridge and Neff, 1976).

Human Access and Roads

The major consideration in the roading of elk habitat is the human access it will allow into elk sanctuary areas. Thiessen (1976) states, "The substantial reduction of elk...between 1960 and 1974 was probably caused by direct overharvest of female elk. This was made possible by a combination of proliferating access into the unroaded elk sanctuaries, coupled with hunting seasons promoting high level hunting opportunity."

Leege (1974) believed that the decline of elk in the Pete King Creek area was due to "increased access into the timbered portions of the drainage brought about by numerous logging roads (making) elk more vulnerable to hunters..." The size of security areas that should remain after logging will vary with the distance from open roads, since most hunters do not penetrate much beyond one mile from an open road (Ream et al. 1974).

Roads may limit or exclude elk use of preferred habitat when:

- Road locations are such that adequate buffer strips are not provided between the road and the habitat in question.
- Road density is such that minimum security cover needs are eliminated.
- Road activity is such that elk tolerance limits are exceeded.
- Road locations that interfere with major travelways, such as saddles and ridge tops.

Roads may become barriers to elk movements when:

- Cut slopes are over 2.5 meters (8 feet) high with a ¾ to 1 or steeper slope.
- Slash on fill slopes (below road) is in excess of 0.5 meters (1.5 feet) deep and has less than one opening per 200 meters (650 feet).

Recommendations

- All elk trails crossed by roads should provide access on cut slopes not to exceed natural gradients. If slash is piled along roads, openings 4 meters (13 feet) wide are required at trail crossings.
- Where cut slopes are over 2.5 meters (8 feet) in height and/or have a greater than .75 to 1 slope, elk access will be provided at major trails and travelways.
- Slash disposal for road construction shall be such that no barriers to elk movement are created. Slash depths should not exceed 0.5 meters (1.5 feet) in depth, in areas where complete slash disposal is impractical, openings 4 meters (13 feet) wide at 200 meter (650 feet) intervals are essential.
- Narrow rights-of-way should be maintained. Vegetation removal along roadsides should not extend further than excavation or fill.
- Roads near meadows and other openings, including cutover areas, should have a minimum of 400 meter (1,300 feet) forested barrier between the road and the opening.
- Roads should avoid saddles and ridge tops whenever possible.

Road Closures

The ability to close roads provides the land manager with numerous options to control and uses in a given area.

Permanent Closures

Permanent closures have many advantages in that they insure greater security for elk and provide increased forage when the roadbed revegetates to native and planted species. In any sale area, all temporary and spur roads should normally be permanently closed.

Temporary Closures

Temporary closures may be utilized on system roads where continued access is necessary. Temporary closures may be implemented to:

– Reduce hunter access. This would provide elk with sanctuaries during hunting season. These closures should be initiated beginning September 1 and continue through the elk hunting season.

– Protect special habitat. Such closures would provide protection to wallows, calving areas, security cover, etc.

– Reduce stress to wintering elk. Such closures would protect elk on wintering ranges from harassment by snowmobilers and other motorized activity.

Gate Closures

Gates provide the option to permanently close roads; to close to public access but allow administrative uses; to close during period when resource damage can occur; or to provide for future closure should indications of resource damage occur.

Recommendations

– Gates should be installed at onset of road building activity.

– Gates entering any active timber sale area should be closed and locked during any period of inactivity exceeding 48 hours.

– Gates should be signed to indicate: 1) the season or period of closure, and 2) the reasons for closure.

Buffer Strips Along Roads

Constant human activity and traffic on forest roads left open to motorized travel serve to render portions of otherwise usable habitat useless to the elk. From this standpoint, it is necessary to utilize buffer strips to reduce the adverse impacts on roads that cannot be closed.

Recommendations

– Allow for hiding cover to act as buffer strips along permanent open roads.

– Tie these buffer strips to travel lanes which are provided throughout the sale.

– The accepted width of a given buffer strip should be minimum of 1.5 sight distances:

GRAZING AS RELATED TO SILVICULTURAL PRESCRIPTIONS

On occasion, specific silvicultural prescriptions may allow for short-term livestock grazing opportunities. The effects of livestock grazing as it applies to elk and their habitat indicate, for the most part, that competition for forage exists and that inter-specific interaction occurs.

Predicting Elk Responses to Habitat Changes and Disturbance Factors

Cover:Forage Ratios

Wildlife biologists in northern Idaho generally concur that on summer and spring-fall range cover is a more important component of elk habitat than forage since it is more frequently lacking. Consequently, when logging, there is a greater potential for reducing elk use by removing cover than there is for increasing elk use by improving forage production. However, on winter and early spring ranges, forage requirements are commonly higher than the habitat can easily provide. Hence, on these ranges, forage production increases which result from logging can be a major benefit.

Some habitat types are especially important as summer range because of the high water table and subsequent cool temperatures and succulent vegetation they possess. Maximum elk use is assumed to occur in these areas when 75 percent is in cover. Any further removal of canopy tends to decrease the attributes elk seek there during the hottest part of the year.

Other habitat types provide dense thermal cover on summer and spring-fall ranges but are not as moist and, therefore, not as attractive to elk during mid-summer. Those areas can be made more attractive by increasing forage production which will be utilized by elk primarily during spring, early summer, and late fall.

A third category of habitat types occurs primarily at lower or higher elevations where summer use by elk is usually light because of a lack of thermal cover and/or inherently poor forage production. The low elevation habitat types are more commonly used by elk during the winter and early spring months, and any logging should be evaluated in light of elk needs at those times of the year. In some cases it will be necessary to establish season of use by ground surveys before logging can be properly evaluated.

On winter ranges, forage is usually a more critical factor than is cover. A forage:cover ratio of 75:25 is best where snow depths are less than 0.5 meters (1.5 feet) on the ground during most days of an average winter. Cover needs are minimal on this type of winter range if isolated from man's activities (Leege and Hickey 1977). However, Montana studies indicate elk prefer dense timber stands and larger trees for bedding cover. These areas are normally near foraging areas. Bedding areas were abandoned following heavy selection logging (Beall 1976). When snow depths average 0.5 meters to 0.8 meters (1.5 to 2.5 feet), a 60:40 ratio is necessary. On winter ranges where snow depths are more than 0.8 meters (2.5 feet) on most winter days, a 40:60 ratio provides optimum habitat. The additional cover is necessary to intercept the snow and provide for ease of movement. However, the proper ratio and snow depths are only one factor of winter range needs. Range quality is largely determined by the amount of palatable and nutritious browse being produced in forage areas. Other important factors include aspect, location, and juxtaposition with other habitat requirements.

Roads

It should be made clear at this point that optimum habitat assumes a proper distribution of cover and forage and also, more importantly, that the habitat is not being adversely influenced by man. When frequent man-associated disturbances are introduced, an elk's need for cover increases significantly. Roads are the means by which most man-associated disturbances arrive on elk ranges, and consequently, a method of predicting effects of roads on elk use has been devised.

Adjacent Areas

An area proposed for a timber sale cannot be properly evaluated for elk use without giving some consideration to surrounding habitat. The optimum forage:cover ratio in the proposed sale area will depend to some extent on the forage:cover ratios and access roads in the areas on all sides of it. For example, a 100-acre patch of standing timber is more important as hiding and/or thermal cover if the 500 acres immediately adjacent on all sides have been recently clearcut than if similar timber still remains on all sides.

Sales should be evaluated on how they affect not only the area within the sale boundary, but the entire home range of the elk which use the sale area. As noted earlier, the average summer home range for a cow elk is about 6 square miles (3,800 acres) (Zahn 1974 and Ream et al. 1974). We propose this to be the size of the land unit on which a logging sale impacts elk. To define the area, the center of the sale area is estimated and serves as the center of a circle which encompasses the home range acreage.

If the sale area is larger than 3,800 acres, home range acreage need not be considered, and only the area within the sale boundary is evaluated. If portions of the sale area lie outside the home range circle, those portions should be included. In both the sale and home range acreages the term "adjacent area" then refers to that area outside of the sale area boundaries but within the home range.

APPENDIX C – OLD GROWTH DEFINITIONS

EXTRACT FROM NORTHERN REGION
USDA FOREST SERVICE
APRIL 1992
R-1 SES 4/92
(errata corrected 02/05)

OLD-GROWTH FOREST TYPES OF THE NORTHERN REGION

by

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INTRODUCTION

In 1989, The Chief of the Forest Service established a National Old Growth Task Force and an action plan to deal with management of old growth forests. The action plan called for each Region to develop local definitions based upon a national generic definition of old growth. Regional definitions were not to be tied to resource values derived from old forests, but would be based on ecological attributes. In 1989, Region 1 named an old growth committee and set forth an action plan for meeting national requirements.

Many people do not see the National Forests as "working" forests, but rather believe old growth is the ultimate and desirable forest condition. Others believe old growth has value only as habitat for dependent or associated wildlife species. Old growth has an important role to play in forests managed for multiple resources. Region 1 views old growth as one element of the total diversity that should be found in a healthy forest landscape.

Region 1 old growth types were developed by three committees representing the major geographic areas of northern Idaho, western and eastern Montana. Each National Forest involved concerned publics as these definitions evolved. The Intermountain Research Station participated in this effort as well as interest groups from outside of the agency. The definitions have been coordinated with similar efforts in adjoining Forest Service Regions 4 and 6.

These definitions will be used in the implementation of Forest Plans. Where there are conflicts with existing plan requirements, differences will be worked out on a case-by-case basis. These definitions will be used as Forest Plans are revised. They will constitute an important criteria for the current Regional effort of Sustaining Ecological Systems.

Both NFMA and WO direction prescribe an ecological approach to old growth that considers old growth as a key element in providing for biological diversity. Old growth dependent and associated species are provided for by supplying the full range of the diversity of late seral and climax forest community types that make up habitat for these species.

Past efforts at developing old growth definitions were generally applicable only to the area where they were developed, because they were not stratified based on site potential. Because of differing capabilities of the land, adequate and defensible old growth definitions should be based on a site potential stratification, such as habitat type, series, or habitat type groups. Otherwise, type descriptions will fail to adequately describe old growth across a variety of site conditions. As examples, stands with lots of 21" diameter trees could easily be produced on sites with hemlock and cedar potential in 90 years. On the other hand, many higher elevation subalpine fir sites could never grow a 21" tree. Multi-storied stands may be elements of old growth on many hemlock and cedar habitat types, but they probably are not natural on drier Douglas-fir or ponderosa pine habitat types.

Habitat types are based on the biological capability of the land to produce a given type of plant community at the endpoint of secondary succession (climax). Normal timber management rotations do not extend long enough to produce climax plant communities, or subclimax late seral community types that would be part of a natural landscape. A biodiversity-based approach to old growth management seeks to maintain a relatively natural range of both climax plant communities and late seral subclimax communities. Both climax and late seral subclimax community types will be composed of stands with mixes and structural characteristics that are not commonly seen in current timber management regimes.

Ecological definitions of all successional stages, stratification by habitat types, and other site conditions will help us do a better job of managing for a landscape with a full range of natural biological diversity.

As we inventory the landscape, we must gather enough hard data to provide for management needs and to improve our understanding of communities and their dynamics. The old growth types of this report are a first step in describing the successional stages for forest types of the Northern Region.

ECOLOGICAL CONCEPTS RELATED TO OLD GROWTH FORESTS

The term old growth has not been a well defined or common term in much of the forest ecology literature. The older stages of forest succession have typically been referred to as late seral, climax, mature, or overmature (Dansereau 1957; Daubenmire 1968; Kimmons 1987; Spurr 1964; Weaver and Clements 1938). The old growth stage is thoroughly discussed by Oliver and Larson (1990), with references to old growth dating back to the 1940s. Environmentalists have typically used ancient, primeval, and virgin forest as terms for the older stages of forest succession (Hunter 1990).

With the emergence of old growth as a management issue in the 1980s, that developed first in western Washington and Oregon, the literature has become prolific with discussions of old growth definitions and characteristics. Various definitions have been developed and used for the forests of Washington and Oregon (Franklin and others 1986; Franklin and Spies 1991; Marcot and others 1991).

Unfortunately the definitions and ecological relationships for forests of Washington and Oregon have often been extrapolated to the northern Rocky Mountains of Idaho and Montana. The ecological systems of the northern Rocky Mountains are significantly different than the Cascades, due to a variety of factors. Primary factors that differ include: a climate that is transitioning from marine to continental influences; an older land surface with complex geologic history and soil development; generally drier conditions with relatively frequent droughts and extensive fire; stand and fuel conditions that often result in running or creeping ground fire that does not kill the overstory trees; stressed sites that have significant insect and pathogen influences; and a different complex of biogeographic fauna and flora that have evolved in a very different system.

Based on Oliver and Larson (1990) true old growth would only include trees that have grown up without outside stand initiating disturbances. Transition old growth can contain large, old trees that are relics from stand initiating disturbances. This definition is promoted by Hayward (1991) in emphasizing that old growth should be restricted to stands that are influenced by within-stand processes. This narrow definition generally does not fit with stand development processes common to the northern Rocky Mountains. This is well documented by Achuff (1989) and Habeck (1988; 1990) in reviews of old growth forests. Old growth stands in the northern Rockies that proceed from a stand-consuming fire, through dominance by seral tree species, and then to climax are typically short lived, due to the high probably of crown fire. Many of the oldest stands of old growth are dominated by seral tree species that are maintained as dominants and protected from crown fire, by repeated underburns that reduce ladder fuels and competition from more tolerant tree species. These relationships are well documented by Arno and others (1985), Arno (1980), Fisher and Clayton (1983), and Fisher and Bradley (1987). In reviewing historic data it has recently been determined that the bulk of the presettlement upland old growth in the northern Rockies was in the lower elevation, ground-fire maintained ponderosa pine/western larch/Douglas-fir types (Losensky 1992). This does not mean that other types of old growth were not common or not important, but it emphasizes that the older stages of succession in the northern Rockies do not follow traditional old growth climax succession theory. In essence it provides solid support for more region-specific old growth definitions and understanding of ecological relationships.

As the old growth issue began to receive national attention, it became apparent that the definitions that had been developed for Washington and Oregon would not work for other geographic areas. This is reflected by Hunter (1987) who emphasized that there was no generally accepted definition, that the climax forest idea was too restrictive, and that old growth forests should be relatively old and relatively undisturbed by humans. Thomas and others (1988) emphasize that there is no single all-inclusive definition and that old growth characteristics vary by region, forest type, and local conditions. Hunter (1990) promotes that a universal old

growth definition is not desirable and that forest ecologists should develop unique definitions for each forest type, taking into account forest structure, development, function, and patterns of human disturbance.

This general emphasis in the scientific literature for region and type specific definitions evolved into national Forest Service direction in 1989. This included a generic definition of old growth forests as "ecosystems distinguished by old trees and related structural attributes." Within the description old growth could encompass both seral fire-dependent species and tolerant, climax species. The national direction provided a list of general characteristics that "typically" distinguished old growth from younger growth.

Within the Northern Rockies various attempts at old growth definition were made during the Forest planning process. Unfortunately, these efforts continued to follow the definitions being developed in Oregon and Washington or emphasized structural characteristics related to old growth-associated wildlife species. Pfister (1987) conducted the first quantitative analysis based on ecological data for the Northern Rockies. This effort concentrated on the Kootenai and Nez Perce National Forests and provided a structure for the analysis presented in this paper. The analysis provided a basic review of concepts and provided an ecologically based classification of old growth based on numbers of large trees, snags, and down logs and described associated attributes of layers, canopy cover, age, and basal area. Pfister (1987) provided eight recommendations for further analysis, some of which have been crucial in conducting the regional level analysis.

ECOLOGICAL STRATIFICATION FOR THE NORTHERN REGION

In order to classify old growth forests it was decided that the most applicable system for stratification of site potential would be groups of habitat types. The habitat type classification systems used for this grouping are the "Forest Habitat Types of Northern Idaho: A Second Approximation" (Cooper and others 1991) and "Forest Habitat Types of Montana" (Pfister and others 1977).

Habitat types were grouped using the interdisciplinary process. For each zone a group of ecologists, soil scientists, and silviculturists met and selected criteria for grouping similar habitat types. Criteria used for grouping included: similarity of disturbance response, potential productivity, potential stocking density, potential down wood accumulation, fire frequency, and tree species. These groups relate closely in the environment with temperature and moisture regimes.

Appendix A, table 1 (Tab A) provides a listing of habitat type alpha and numeric codes for groups in Idaho, north of the Salmon River. Due to differences in precipitation distribution, length of growing season, and floristic composition, the habitat types that occur in a given group will differ between geographic areas.

The old growth types for the Northern Region have been developed for three different geographic areas within the Region. The Region was geographically stratified into northern Idaho, western Montana, and eastern Montana. The Northern Idaho Zone is the western side of the northern Rocky Mountains in Idaho that is heavily influenced by pacific storms and weather patterns and generally received higher precipitation, especially in the winter, than areas to the east. The area generally north of Lake Coeur d'Alene has landforms designed by past continental glaciation, while the areas to the south have been primarily influenced by steep river downcutting and mountain glaciation. Northern Idaho is also heavily influenced by past volcanic events that deposited ash, which gives the soils relatively higher moisture holding capabilities.

The Western Montana Zone generally extends from the Bitterroot Mountain Divide to the Continental Divide of the Rocky Mountains in Montana. This area is influenced by pacific storms, with relatively high precipitation in the winter, but is also in the rain shadow of the Bitterroot Mountains. Some continental climatic influence also occurs and this area typically receives a higher percentage of precipitation in the summer than northern Idaho. Some areas in western Montana have soils developed on volcanic ash, but much less than in northern Idaho. The area north of Missoula has landforms designed by past continental

glaciation while the areas to the south have been primarily influenced by glacial lake deposition, moderate river downcutting, and mountain glaciation.

The Eastern Montana Zone generally extends from the Continental Divide east to the eastern portions of the Rocky Mountains that occur near Billings and north to Lewistown and Great Falls. This area is strongly influenced by both a continental climatic influence and storms from the west. It lies in the rain shadow of the Rocky Mountains and receives much less precipitation than northern Idaho or western Montana. A relatively high percentage of the precipitation occurs in the summer. A minor percentage of the soils are influenced by volcanic ash deposition. A large percentage of the soils are developed on limestone parent material. Landforms north of Great Falls were generally developed through continental glaciation, while landforms to the south were generally developed as a result of mountain glaciation and gradual to moderate river downcutting.

ANALYSIS PROCESS FOR CLASSIFYING OLD GROWTH TYPES

For each geographic zone of the Region a committee was selected that included members from National Forest Systems, Forest Service Research, Universities, and the public. Each committee was chaired by a Forest Supervisor and had members from each National Forest that represented various disciplines. The committees also coordinated with adjacent Forests in other Regions. The R1-RO Ecology group provided coordination and leadership throughout the process and developed the computer analysis tools with the assistance of the Regional Timber inventory group. The committees conducted a preliminary analysis to develop the draft definitions presented in this report. Further refinement and development of descriptions will be conducted as more data is collected.

The concept of old growth was based on the National definition. In this definition old growth forests are considered ecosystems that are distinguished by old trees and related structural attributes. They encompass the later stages of stand development that typically differ from earlier stages in characteristics such as tree age, tree size, number of large trees per acre and basal area. In addition, attributes such as decadence, dead trees, the number of canopy layers and canopy gaps are important but more difficult to describe because of high variability.

The October 1989 Forest Service position statement on old growth recognized that "old growth forests encompass the late stages of stand development and are distinguished by old trees and related structural attributes . . ." and that " . . . specific attributes vary by forest type." Forest Service Regions were charged with developing forest type old growth definitions, and conducting old growth inventories.

Both biological processes and human values were considered to determine criteria for old growth. As stands develop and age, there are changes in ecological composition, structure, and function as well as changes in aesthetic and economic values. The point in that process of forest aging where a stand is classified as old growth is largely a function of human values and concerns. It's similar to the process of human aging. People change in real physical ways as they age. But, how old is considered old, depends upon whether you ask a 15 year old, a 40 year old, or a 70 year old person.

Forest Plans generally set timber rotations at approximately 100 years, plus or minus 2 decades. Old growth has become an issue because some people think that it might be in short supply. Therefore, our concern with old growth focuses on forests with tree ages and sizes, or stand structures significantly different than what could be obtained in 100 years.

Plot data from the Northern Region stand exam inventory (USDA Forest Service R-1; 1989) were used as the basis for the old growth definition analysis. All plots that met a given set of criteria were used in the analysis.

The criteria for inclusion of a plot in the analysis were:

1. Plots were survey type 45 and 46, which meet full standard exam procedures.

2. Plots were selected from stands with no evidence of logging.

3. Plots had an identified habitat type.

4. The largest tree on the plot was equal to or greater than 100 years old and ≥ 9 inches diameter at breast height (dbh).

5. The plot basal area for trees equal to or greater than 5" dbh was ≥ 40 sf/acre.

A total of 680,000 plots were screened for the Idaho Panhandle, Clearwater, and Nez Perce National Forests in northern Idaho. A total of 1,068,000 plots were screened for the Kootenai, Flathead, Lolo, and Bitterroot National Forests in western Montana. A total of 388,000 plots were screened for the Lewis & Clark, Helena, Deerlodge, Beaverhead, Gallatin, and west side of the Custer National Forests in eastern Montana.

Habitat types are a land classification system based on the potential plant associations that will dominate a site at the end point of plant succession (climax). Habitat types are ideal for stratifying site conditions in order to predict the type of old growth forest they will produce. The plot data was sorted into groups of similar habitat types. Before a site reaches climax condition, it may be dominated by several different conifer tree species (with some associated structural differences), so plots in each habitat type group were subdivided by forest cover type (based on plurality of tree species basal area).

Within each habitat type group and forest cover type group, plots containing large trees over 100 years of age were selected for further analysis. The guiding principle was to select plots containing large, old trees that would represent the latter stages of stand development. These plots with large old trees were then further analyzed to determine the characteristics typical of old growth. These plots with old trees were analyzed for significant differences in tree ages, sizes, and forest stand structures and composition. Based on groupings of the data, and on professional judgment of the foresters, ecologists, and wildlife biologists, the following ages were selected as minimums:

North Idaho		
	All types except lodgepole pine	150
	Lodgepole pine	120
Western Montana		
	Ponderosa pine, Douglas-fir, western larch	170
	Lodgepole pine	140
	Other types	180
Eastern Montana		
	Douglas-fir types 1 and 2	200
	Limber pine	120
	Lodgepole pine	150
	Subalpine fir type 10	135
	Subalpine fir other types	160
	Whitebark pine type 11	150
	Whitebark pine type 12	135
	Pondersoa pine	180
	Douglas-fir type 3	180

The other minimum criteria -- tree size, and number of large trees per acre -- were selected to distinguish those stands where the old trees were dominating the stand structure. The number of trees equal to or greater than a given age and size (diameter at breast height) were used as minimum screening criteria for old growth. Associated characteristics (such as number of snags, down woody material, dead tops and decay, and diameter variation) represent the means, values, and ranges for structural characteristics found in the data for plots that met the old growth minimum criteria.

Three broad old growth stand structures were recognized in the analysis:

1. *Late Seral, Single-Story* -- these stands are still dominated by the tree species and tree canopy layer that first captured the site after a stand replacing disturbance. The upper canopy is relatively closed. If understory trees were present, they are generally small, exhibit little growth, and do not form an apparent canopy layer. Other understory vegetation may be sparse. Ages and sizes of dominant trees are significantly beyond what may be found at culmination of mean annual increment of tree stand volume growth, growth rates are slowing, and tree crowns are showing signs of maturity or old age (flat, wide tops with slow main leader growth). This stage may have moderate amounts of tree decay, but little mortality, and few snags or pieces of down woody material.

2. *Late Seral, Multi-Story* -- the initial seral trees and canopy layer have lost control of the site. Disturbance or the natural mortality of age has produced holes in the upper canopy; shade tolerant understory vegetation and trees are increasing in crown volume; and shade tolerant understory tree species are growing towards the main canopy, and may have occupied part of it. Two or more canopy layers are obvious, the canopy may be irregular, and broken tops, bole rot, snags, and large down woody debris may be common. The stand may have small openings dominated by shrubs or understory forbs. Although there may be some very large or old individual trees, stand average diameter and age may be either greater or less than in the previous Late Seral, Single-Story stage. There is often great variation in average tree diameter.

3. *Near Climax* -- this stage is dominated by shade tolerant (possibly climax) tree species that captured the site after the initial seral stand has been largely replaced. A few remnant shade intolerant, early seral trees may persist, but they represent a small part of total live canopy. Depending upon overstory structure, there may be great variation in understory characteristics and tree diameter distributions. If the shade tolerant tree species are relatively short lived (such as subalpine fire), or only moderately long lived (such as grand fir), the canopy will be multi-storied, and contain significant numbers of snags and down woody debris. If the shade tolerant tree species is very long lived (such as cedar), there may be 1 dominant canopy layer, with relatively few snags or pieces of down woody debris.

The above 3 stages are generalities useful for explaining why an individual old growth stand may be expected to have, or not have, various structural characteristics sometimes identified with old growth in forest ecology literature. Individual old growth stands may combine various elements of the above 3 stages, or may have some other unique characteristics as the result of particular site and stand history.

The plot data base was stratified by habitat type groups and forest cover types. The forest cover type was assigned to the tree species with plurality of basal area for trees equal to or greater than 9" dbh. Data from these plots on numbers of trees by 4" diameter size class, basal area, layers, snags, decay, broken tops, age, and crown ratio were graphed in various combinations, analyzed in frequency diagrams, and displayed in tables. Interdisciplinary team members from the zone committees and Forests then reviewed the output and identified minimum screening criteria for old growth for each habitat type group and forest cover type by Forest. Zone committees then met and grouped this data into minimum criteria for screening stands for old growth.

The minimum screening criteria can be used to identify stands that may meet the old growth type descriptions. Type descriptions are presented in a later section of this report. The screening criteria are presented in Table 1. In the table the column headings are defined as follows:

Old Growth Type - the type is a group of forest cover types that have similar characteristics relative to size, number and age of dominant overstory trees. The forest cover types are identified with the following codes: PP - ponderosa pine; DF - Douglas-fir; L - western larch; LP - lodgepole pine; Y - western yew; GF - grand fir; SAF - Engelmann spruce and subalpine fir; WH - western hemlock; WP - western white pine; MAF - mountain hemlock, alpine larch, and subalpine fir; WBP - whitebark pine; C - western redcedar; PF - limber pine,WSL-combinations of alpine larch, whitebark pine, and limber pine

Habitat Type Group - Habitat types are grouped differently according to geographic zone. The letters identify the zone habitat type groups displayed in Appendix A (Tab A). Habitat type groups are grouped into larger groups based on similarity of temperature and moisture regimes within each zone.

Minimum Criteria:

Minimum Age of Large Trees - This is the minimum average age for the largest size class for the old growth type.

Number TPA/DBH - Number of live trees per acre equal to or greater than a given dbh level and age. This would be the minimum number of live trees per acre equal to or greater than a set dbh level and age.

Minimum Basal Area - the minimum basal area in square feet for trees equal to or greater than 5" dbh.

Associated Characteristics:

DBH Variation - variation in diameter of trees equal to or greater than 9" dbh. The variation is classed in L = low (+ 0-20%), M = moderate (+ 21-40%), and H = high (+ 41-100%).

Percent Dead/Broken Top - the percent of trees equal to or greater than 9" dbh. with dead or broken tops.

Probability of Down Wood - the probability that abundant down wood ≥ 9" diameter will be present. Probabilities are classed into L = low (+ 0-20%), M = moderate (+ 21-40%), and H = high (+ 41-100%).

Percent Decay - the percent of trees equal to or greater than 9" dbh with significant decay.

Tree Canopy Layers - an indication of the number or variation in numbers of tree layers that can be expected. SNGL = single layer; MLT = multiple layers.

Snags ≥ 9" - range in number of snags (dead standing trees) ≥ 9" diameter.

No. of Samples - this is the number of plots from the plot data base that met the screening criteria and are used in the old growth type descriptions.

TABLE 1 NORTHERN IDAHO ZONE OLD GROWTH TYPE CHARACTERISTICS *(2/05 errata edit)*

DESCRIPTION		MINIMUM CRITERIA			ASSOCIATED CHARACTERISTICS						
OLD GROWTH TYPE	HABITAT TYPE GROUP	MINIMUM AGE OF LARGE TREES	MINIMUM NUMBER TPA/DBH	MINIMUM BASAL AREA (FT^2/AC)	DBH VARIA-TION 2/	PERCENT DEAD/ BROKEN TOP 1/	PROB-ABILITY OF DOWN WOODY 2/	PER-CENT DECAY 1/	NUMBER CANOPY LAYERS 3/	SNAGS ≥9" DBH 1/	NUMBER OF SAMPLES
1 - PP, DF, L	A,B	150	8 ≥ 21"	40	M	0 - 30	L - M	0-8	SNGL/MLT	0 - 13	815
2 – LP	B,C,D,E,G,H,I,J,K	120	10 ≥ 13"	60	M	0-19	M	2-13	SNGL/MLT	1 - 37	875
3 - Y	C,C1, G1	150	3 ≥ 21"	80	M	7 - 10	H	9-34	SNGL/MLT	5	26
4A - DF, GF, L, SAF, WP, PP	C, C1,D,E	150	10 ≥ 21"	80	M	3 - 28	M	2 –33	SNGL/MLT	7 - 35	2,938
4B - DF,GF, L, WH, WP, PP	F,G,G1,H,I	150	10 ≥ 21"	120 / 80 (4)	M - H	0 - 22	M - H	1- 41	SNGL/MLT	0 - 33	8,069
5 – SAF,MAF	F,G, G1,H,I	150	10 ≥ 17"	80	H	5 - 36	H	5-28	MULTIPLE	6 - 36	4,275
6 – WBP	I, J, K	150	5 ≥ 13"	60 / 40 (5)	M	0 - 17	M	6-17	SNGL/MLT	11 - 42	43
7 – C	F,G,G1	150	10 ≥ 25" (6)	120	M	5 - 36	L - H	6-55	SNGL/MLT	6 - 47	5,865
8 – DF,L, SAF,MAF,WP	J	150	10 ≥ 17"	60	M	1 - 14	M - H	1-15	SNGL/MLT	3 - 40	890
9 – SAF,MAF	K	150	5 ≥ 13"	40	H	21 - 23	M	13-35	MULTI	11 - 13	26

1/ These values are not minimum criteria. They are the range of means for trees ≥9" DBH across plots within forests, forest types, or habitat type groups.

2/ These are not minimum criteria. They are Low, Moderate, and High probabilities of abundant large down woody material or variation in diameters based on stand condition expected to occur most frequently.

3/ Not a minimum criteria. Number of canopy layers can vary within an old growth type with age, relative abundance of different species and successional stage.

4/ In Old Growth Type 4B, 120 ft^2 applies to habitat type groups F, G, and G1, and 80 ft^2 of basal area applies to habitat type groups H & I.

5/ In whitebark pine forest type, 60 ft^2 of basal area applies to habitat type groups I and J, and 40 ft^2 applies to habitat type group K.

6/ In Old Growth Type 7, the 25" minimum DBH only applies to cedar trees; old trees of other species are evaluated with a minimum DBH appropriate for that species on these habitat types (21" for DF, GF, L, WH, WP, PP; and 17" for SAF, MAF)

CORRELATION WITH ADJACENT REGIONS

Old growth types were correlated across regional boundaries with Region 6 (Washington and Oregon) and Region 4 (southern Idaho and Wyoming). Meetings were held with regional representatives on June 11, 1991 in Spokane, Washington and on October 4, 1991 in Missoula, Montana. Most definitions correlated fairly well. Region 6 will use R-1's definitions for seral cover types in eastern Washington and Oregon.

USE OF OLD GROWTH TYPE DESCRIPTIONS

Forest stand composition and structure is a function of site physical characteristics (soil, climate, topography), the particular history of that site, the characteristics of the species that occupy the site and their interactions, and the physical and biological forces that affect the site during successional development. The rugged, mountainous topography of the Northern Region is overlain with a complex climate produced by the west to east intersection of the pacific Marine climate with the Great Plains Continental climate. There is great annual variation in both temperature and moisture, and there is a large amount of variation from year to year around the long term averages for any given date or month. There is also great variation in type and severity of disturbance mechanisms, both natural and man caused. The result of this variety of forces that shapes individual stands, is a wide variation in the resulting stand structures. No set of generated numbers can capture all the variation that may occur at any given age or stage in forest development.

Because of the great variation in old growth stand structures, no set of numbers can be relied upon to correctly classify every stand. In addition, the uncertainties of sampling and statistics introduce another need for caution in using stand data. The minimum criteria in the "tables of old growth type characteristics" are meant to be used as a screening device to select stands that may be suitable for management as old growth, and the associated characteristics are meant to be used as a guideline to evaluate initially selected stands. They are also meant to serve as a common set of terms for old growth inventories. Most stands that meet minimum criteria will be suitable old growth, but there will also be some stands that meet minimum criteria that will not be suitable old growth, and some old growth may be overlooked. **Do not accept or reject a stand as old growth based on the numbers alone; use the numbers as a guide.**

A stand dominated by trees of the age and size listed under minimum criteria is generally good potential old growth. The number of trees is meant as a guideline for how many trees it takes to produce older stand characteristics, and should not be used as an absolute. The large tree age listed under minimum criteria is meant to define the minimum age which we will consider old growth, but that age is difficult to measure because some of the oldest trees may be too rotten or too large to accurately age. For this and other reasons, although age is the single most valuable guide for determining when a stand is old growth, age is often the least reliable data in an inventory. Tree size generally increases as a tree ages, but stand density and mortality affect tree size. The associated characteristics listed in Table 1 are meant to be guidelines in evaluating stands. A stand should not be accepted or rejected as old growth simply on the basis of associated characteristics. The predominance of minimum criteria and associated characteristics, rather than a single number, generally will be an excellent guide. Be aware that the associated characteristics of "DBH variation" and "tree canopy layers" were only provided as a descriptor of what was most common in existing inventory data, and should not be used to decide whether a stand is really old growth. Use these numbers and descriptions as guides in applying the basic principle that old growth is a "late stage of stand development" . . . " dominated by old trees and related structural attributes."

Where stand examination data is available, this data may be compared to the old growth minimum criteria in Table 1, by habitat type group and forest cover type. Run Code 22 on the Forest Service Region 1 "R1EDIT Menu" (available in all Forest Service Region 1 Data General computers in the R1EDIT Program Package) is designed to extract potential old growth stands from the R1EDIT stand exam data base. Run Code 22 is an interactive program that allows a user to specify a group of habitat types and forest cover types, and specify the minimum criteria of number of trees, minimum age, and minimum diameter. The program will then

return a list of stands from the R1EDIT data base that meets the specified characteristics, and will give some summary data for each stand. A separate Run Code 22 extract will be needed for every combination of habitat types and forest cover types that has unique characteristics.

The minimum criteria are used to determine if a stand is potentially old growth. Where these values are clearly exceeded, a stand will usually be old growth. The associated structural characteristics may be useful in decision making in marginal cases, or in comparing relative resource values when making old growth evaluations.

In a few cases of multi-species stands, the forest cover type automatically assigned by the stand exam system (and stored in the TSMRS database), and the forest type calculated by Run Code 22 may both be misleading when trying to make an old growth determination. Sometimes, a dense understory of smaller and/or younger trees of one species may make up the plurality of basal area, while the big old trees may be composed of different species / species combination. For example, in a multi-species stand, cedar could be 25% of the stand basal area, and still be assigned the forest type, because it has more basal area than any other single species, but another species (or species combination) may make up most of the big old trees. In Northern Idaho, old cedar trees usually have a larger diameter than other species of the same age. For this reason, the minimum diameter for cedar old growth was set larger than for other species on the same habitat type. But, if a minimum DBH for cedar was applied to old trees of a different species, it might lead to inappropriate conclusions about whether or not the stand was old growth.

For this reason, when screening potential old growth stands, forest type needs to be calculated in a way that's relevant to old growth determination. Use the following methodology:

- For all forest types, assign old growth forest type based on the plurality of basal area in <u>trees ≥ 9" only</u> (this was plot data analyzed by the Northern Region Old Growth committees).
- In northern Idaho, if the Forest Type is cedar, use the 25" minimum DBH for the old cedar; but (consistent with rest of Table 1) use a 21" minimum DBH for DF, GF, L, WH, WP, PP; and a 17" minimum DBH for SAF & MAF old trees.

Other forest types may also very occasionally have situations like cedar, with the big old trees being a different species than the forest type. Because this is relatively uncommon with other forest types, it's best dealt with through individual stand assessment when doing project level analysis. When doing fine-scale project level assessments, detailed analysis of stand characteristics, and consideration of the site and landscape considerations discussed below all contribute to the best selection of potential old growth.

In addition to using old growth minimum criteria with the stand exam data base R1EDIT Menu, Run Code 22 for extracting potential old growth stands, additional Run Code 22 extracts with stepped down standards are recommended. These step down runs are useful to extract stands that are either close to being old growth, or are actually old growth, with an inclusion of younger or smaller trees that skews the data. This step down procedure may also identify old growth blocks within larger stands. Step down runs can be done with the minimum criteria backed off slightly (use 1" smaller minimum diameter, or 10 year lower age, or 1-2 fewer trees per acre; possibly do several iterations, each backing down 1 more step).

Because old trees are often rotten and difficult to age, it is recommended that 1 step down version of Run Code 11 be done with a zero age criteria to extract stands where this may be a factor. Careful further evaluation will be needed for any stands extracted with a zero age criteria, since many of these stands will not be old growth.

Where no in-place stand exam data exists, but a site was visited by a professional interdisciplinary team in previous environmental analysis, the notes and determinations of that interdisciplinary team may be used in deciding whether to consider the stand old growth. Be aware that some interdisciplinary teams may have

allocated young stands of old growth to meet predetermined acreage targets, and some of their stands may not meet the type descriptions.

These old growth minimum criteria, associated characteristics, and descriptions were developed to apply to individual stands. When applying these standards, 3 things need to be remembered. First, these numbers represent averages and ranges that either existed in the inventories, or were assigned by professional judgment. While they are good guides, they are not absolute. Because of the innumerable combinations of site characteristics and historical factors that can occur, no set of numbers will correctly define every possible situation. The basic concept is that old growth should represent "the late stages of stand development . . . distinguished by old trees and related structural attributes."

The second point is that old growth is valuable for a whole host of resource reasons such as habitat for certain animal and plants, for aesthetics, for spiritual reasons, for environmental protection, for research purposes, for production of unique resources such as very large trees. Unusual natural communities, etc., the resource values associated with potential old growth stands need to be considered in making allocations.

The third point to bear in mind when evaluating old growth is that a stand's landscape position may be as important, or more important than any stand old growth attribute. The landscape is dynamic. We need to do more than draw lines to manage this dynamic system. Consider the size of old growth blocks (large blocks have special importance), their juxtaposition and connectivity with other old growth stands, their topographic position, their shapes, their edge, and their stand structure compared to neighboring stands. Stands are elements in dynamic landscape. We need to have representatives of the full range of natural variation, and manage the landscape mosaic as a whole in order to maintain a healthy and diverse systems.

At the same time, there may be some stands with trees so large or so old that they are unique. We should always maintain a good representation of these very old unique and outstanding stands, because they are irreplaceable within human life spans. Remember to value the truly unique and outstanding, wherever it may be.

OLD GROWTH FOREST TYPE DESCRIPTIONS

NORTH IDAHO ZONE:
Old Growth Type 1
Ponderosa pine, Douglas-fir, Western Larch Forest Types on warm, dry environments

Habitat Type Groups
Ponderosa pine and Douglas-fir habitat types
North Idaho Zone Groups A and B
This type is moderately well represented across all of the 3 National Forests, but is most abundant in the southern part of the North Idaho Zone. This zone includes the Clearwater, Idaho Panhandle and the Nez Perce National Forests.

Forest Types
Douglas-fir and ponderosa pine are major forest types. Western larch is a minor forest type.

Minimum Characteristics
8 trees per acre 21 inches DBH or more
Large trees 150 years old or more
Basal area 40 ft^2 per acre or more
Sample size: 815 Plots

Site Description
This old growth type occupies warm, dry environments on predominantly steep southerly aspects at elevations from 1000 to 6000 feet. It is on north aspects at lowest elevations. Ponderosa pine is the climax dominant on the driest sites and Douglas-fir on moister sites in these groups. Bunchgrass dominated understories are the least productive, typically with relatively low stocking. Habitat types where shrubs dominate the understory can support greater tree stocking. Prior to 1900, cool underburns at intervals of 5 to 25 years promoted open stands, while hotter stand replacing fires occurred at intervals of 150 to more than 300 years.

Vegetation Characteristics
This type may be single or multistoried. A single canopy layer is most common during seral stages, or in climax ponderosa pine. Large ponderosa pine dominate ponderosa pine habitat types under seral and climax conditions, and pine is a seral dominant on Douglas-fir habitat types. Douglas-fir may be a seral or climax dominant on Douglas-fir habitat types. Larch is a seral dominant on the more moist Douglas-fir habitat types. This old growth type can maintain old growth characteristics for moderate periods in seral stands and for long periods where ponderosa pine or Douglas-fir are climax on the site.

The average age of the largest trees in this type is 225 years, with a range from 208 to 256. Individual trees may reach an estimated age of 475 years. There is an average of 24 trees per acre 21 inches DBH or more. The range of means across forests and forest types is from 18 to 20 on habitat types with dry bunchgrass understories and 19 to 27 on habitat types with shrub understories. The average basal area is 122 ft^2 per acre on sites with bunchgrass understories. The range is 89 to 124 ft^2. On moister sites with shrub understories, the average basal area is 164 ft^2 per acre and ranges from 147 to 193 ft^2.

The average number of dead standing trees 9 inches or more DBH is 5 with a range of 0 to 13. The average percent of trees 9 inches or more DBH with dead or broken tops is 9 with a range of 0 to 30 in means across forests and forest types. The average percent of trees showing decay is 6, with a range of 0 to 8. The probability of rotten, down log pieces 9 inches or more in diameter is low to moderate. Average litter and duff depth is 1 inch or less.

NORTH IDAHO ZONE:
Old Growth Type Code 2
Lodgepole pine forest type, on cool and cold environments

Habitat Types, Groups, and Geographic Distribution
Douglas-fir, grand fir, western red cedar, mountain hemlock, and subalpine fir habitat types. Subalpine fir and mountain hemlock habitat types with clintonia or menziensia in the understory are best represented.
North Idaho Zone Groups B, C, D, E, G, H, I, J, K
This type is well represented across all of the 3 National Forests in this zone. These Forests include the Clearwater, Idaho Panhandle and the Nez Perce.

Forest Types
Lodgepole pine

Minimum Characteristics
10 trees per acre 13 inches DBH or more
Large trees 120 years old or more
Basal area 60 ft^2 per acre or more
Sample size: 875 plots

Site Description
This old growth type occupies cool and cold environments on all aspects at elevations from 2000 to 7000 feet or more. It is in areas of cold air impoundment at lowest elevations. Douglas-fir is the climax dominant on the driest sites, grand fir on cool, moist sites, and subalpine fir on cold moist sites in these groups. Western hemlock and western red cedar are climax on cool sites that are more moist than those that support grand fir. Bluejoint, grouse whortleberry and pinegrass dominated understories are the least productive, typically with relatively low stocking. Habitat types where clintonia, wild ginger, or menziesia dominate the understory are more productive and can support greater tree stocking. Prior to 1900, repeated fires at less than 100 to 150 years favored the occurrence of large stands of nearly pure lodgepole pine. These pure stands are frequently overstocked and potential centers for disease and insect epidemics.

Vegetation Characteristics
This type may be single or multistoried. A single canopy layer is most common in stands of pure lodgepole pine. Multiple canopy layers are more common in stands of lodgepole pine and large trees of other seral species, such as Douglas-fir. Large lodgepole pine dominate these several habitat types where cold and frequent fire favor its occurrence as a seral species. This old growth type can maintain old growth characteristics for short periods until it is replaced by late seral or climax species.

The average age of the largest trees in this type is 173 years, with a range from 151 to 194. Individual trees of more long lived species may reach an estimated age of 347 years. There are an average of 81 trees per acre 13 inches DBH or more. The range of means across forests and forest types is from 15 to 64 on Douglas-fir, grand fir, and subalpine fir habitat types with beargrass or grouse whortleberry understories to 192 on moist subalpine fir habitat types with clintonia or menziesia understories. The average basal area is 171 ft^2 per acre. The range is 148 to 215 ft^2. Low basal areas are associated with the drier and colder environments in this old growth type.

The average number of dead standing trees 9 inches or more DBH is 24 with a range of 1 to 37. The average percent of trees 9 inches or more DBH with dead or broken tops is 9 with a range of 0 to 19 in means across forests and forest types. The average percent of trees showing decay is 7, with a range of 2 to 13. The probability of rotten down log pieces 9 inches or more in diameter is moderate. Average litter and duff depth is 1 to 2 inches.

Undescribed Types

Lodgepole pine forest type on very cold or droughty environments have been described in a few plots. Habitat Type Group K is the most harsh of the subalpine fir series. The minimum basal area requirement should be strongly considered here in determining whether there is really a lodgepole old growth stand.

NORTH IDAHO ZONE:
Old Growth Type Code 3
Pacific yew forest type on cool, moderately moist environments

Habitat Types, Groups, and Geographic Distribution
Grand fir habitat type phases with Pacific yew in the understory and grand fir/arrowleaf groundsel North Idaho Zone Groups C, C1, and G1.
This type is generally limited in occurrence to the Nez Perce National Forest in the North Idaho Zone. These Forests also include the Clearwater and Idaho Panhandle, and infrequently it may appear here, usually on a G1 habitat type.

Forest Types
Pacific yew

Minimum Characteristics
3 trees per acre greater than 21 inches DBH
Large trees 150 years old or more
Basal area 80 ft^2 per acre or more
Sample size: 26 plots

Site Description
This old growth type occupies cool, moderately moist bottomlands and toe slopes as low as 2000 feet elevation, and is on moderate to steep uplands in warm protected exposures and ridge-top benches from 4000 to 5800 feet elevation. It seldom occurs in extensive stands. Grand fir is considered to be the climax tree species, but in this old growth type, Pacific yew is dominant. It is more shade tolerant and, in the absence of fire for many years, could dominate larger areas. Protection from frequent fire by topographic or climatic factors is required for the occurrence of this type.

Vegetation Characteristics
This type may be single or multistoried. A single canopy layer occurs in climax stands, when Pacific yew forms the only tree layer. Multistoried canopies occur when Pacific yew occurs with taller grand fir, or, less frequently, late seral Engelmann spruce. This old growth type can maintain old growth characteristics for long periods in the absence of fire.

The average age of the largest trees of species other than yew in this type is 205 years, with a range from 195 to 209. Individual trees may reach an estimated age of 326 years. There are an average of 13 trees per acre 21 inches DBH or more. These are usually grand fir. The range of means across forests and forest types is 12 to 14. The average basal area is 205 ft^2 per acre.

The average number of dead standing trees 9 inches or more DBH is 5 per acre. The average percent of trees 9 inches or more DBH with dead or broken tops is 8 with a range of 7 to 10. The average percent of trees showing decay is 26, with a range of 9 to 34. The probability of rotten, down log pieces 9 inches or more in diameter is high. Average litter and duff depth is 2 to 4 inches.

Undescribed Types
Pacific yew forest type on western red cedar habitat types with Pacific yew understories (Habitat Type group G1), may occur, but very infrequently. No data are available for these sites. They are currently expected to meet the minimum characteristics described above.

NORTH IDAHO ZONE:
Old Growth Type Codes 4A and 4B
Douglas-fir, grand fir, western larch, Engelmann spruce/subalpine fir, western hemlock, western white pine, and ponderosa pine forest types on cool, moist environments.

Habitat Types, Groups, and Geographic Distribution
All grand fir, western hemlock habitat types, western red cedar habitat types and the warmer and moister subalpine fir and mountain hemlock habitat types. Western red cedar and western hemlock habitat types with oak fern understories and grand fir with beargrass or twinflower understories are best represented.

Old Growth Type 4A is composed of ponderosa pine, Douglas-fir, grand fir, western larch, subalpine fir/ Engelmann spruce, and western white pine forest types on North Idaho Zone Habitat Type Groups C, C1, D, E (grand fir series).

Old Growth Type 4B is composed of ponderosa pine, Douglas-fir, grand fir, western white pine, and western hemlock forest types on North Idaho Habitat Type Groups F, G, G1, H, I (cedar, hemlock, and moist subalpine fir and mountain hemlock habitat type series).

These types are well represented across all of the 3 National Forests in this zone, but grand fir habitat types are more abundant on the Nez Perce, and cedar and hemlock habitat types are more abundant on the Clearwater and Idaho Panhandle National Forest.

Forest Types
Douglas-fir and grand fir are major forest types. Western larch, ponderosa pine, Engelmann spruce/subalpine fir, western hemlock and western white pine are less well represented.

Minimum Characteristics
10 trees per acre 21 inches DBH or more
Large trees 150 years old or more
Basal area: 80 ft^2 per acre or more for all OG Type 4A, and for Habitat Type Groups H and I on OG Type 4B;
120 ft^2 per acre or more for Habitat Types F, G, and G1 on OG Type 4B
Sample size: OG Type 4A: 2,938 plots;
OG Type 4B: 8,069 plots

Site Description
This old growth type occupies moist and cool environments on all aspects and elevations from 1400 feet along stream bottoms to 7300 feet on sheltered aspects. Grand fir is the climax dominant on the driest sites, and subalpine fir and mountain hemlock on the coldest. Western hemlock and western red cedar are climax on cool sites that are more moist than grand fir climaxes, and warmer than subalpine fir climaxes. Cedar and western hemlock habitat types are the most productive and can support greater tree stocking. Prior to 1900, infrequent stand replacing wildfires favored development of long lived seral and climax stands on cedar and western hemlock sites. Moist mountain hemlock and subalpine fir habitat types also have fire intervals of 200 years or more, and a harsher environment favorable to fewer seral species. More frequent fires in grand fir habitat types favor a greater number of seral species.

Vegetation Characteristics
The following descriptions are for all of Old Growth Types 4A and 4B combined. The range of data values of various associated characteristics for Type 4A or 4B separately are shown in Table 1. Even in their associated characteristics these two subtypes are extremely similar, and they are have identical minimum characteristics (except for basal area). They are separated primarily because the forest types and minimum basal areas differ slightly by habitat type group.

These types may be single or multistoried. A single canopy layer is most common in stands of pure Douglas-fir, larch or ponderosa pine. Multiple canopy layers are more common in late seral stands as

climax tree species grow up beneath a seral overstory, or in climax stands with shade tolerant species in both overstory and understory. On cedar and western hemlock habitat types, Douglas-fir, grand fir, and white pine are common seral forest types. Old growth white pine has become increasingly rare due to timber harvest and mortality from blister rust. On grand fir habitat types, Douglas-fir is the most common seral forest type, but grand fir may become established immediately after disturbance on all but the driest sites. Ponderosa pine is a seral species on cedar and grand fir habitat types. Douglas-fir and western larch can occur as seral species on almost all of the habitat type groups in this old growth type. This old growth type can maintain old growth characteristics for moderate periods in forest types of seral species, and for long periods of forest types of climax species in the absence of fire.

The average age of the largest trees in this type is 210 years, with a range from 160 to 264. Individual trees of long lived species like ponderosa pine, western larch, or western red cedar may reach an age of 400 to 700 years. Larch, ponderosa pine or western hemlock forest types have an average age of more than 200 years. There are an average of 27 trees per acre 21 inches DBH or more. The range of means across forests and forest types is from 12 to 53. Ponderosa pine and larch forest types usually support the fewest large trees per acre, averaging 12 to 33. The average basal area is 210 ft^2 per acre. The range is 160 to 270 ft^2. Basal areas in the low part of the range are most often associated with larch and ponderosa pine forest types, and subalpine fir and mountain hemlock habitat type groups (Habitat Type Groups H and I).

The average number of dead standing trees 9 inches or more DBH is 14 with a range of 0 to 35. Variability is highest in the grand fir forest type. White pine forest type average 24 snags per acre because of blister rust mortality. Ponderosa pine forest types average only 7. The average percent of trees 9 inches or more DBH with dead or broken tops is 7 with a range of 0 to 28 in means across forests and forest types. Ponderosa pine and larch forest types are the most variable. The white pine forest type averages only 4 percent dead and broken tops. The average percent of trees showing decay is 12, with a range of 1 to 41. Grand fir, subalpine fir and western hemlock forest types show the greatest decay, and white pine the least. Cedar and western hemlock habitat type groups (F, G, and G1) show the most decay across all forest types. The probability of rotten down log pieces 9 inches or more in diameter is moderate in early seral stands and high in late seral or climax stands. Average litter and duff depth is 1 to 2 inches.

NORTH IDAHO ZONE:
Old Growth Type Code 5
Engelmann spruce/subalpine fir, mountain hemlock/subalpine fir forest types on cold, moist environments

Habitat Types, Groups, and Geographic Distribution
Moist subalpine fir and mountain hemlock habitat types, and the colder western hemlock and western red cedar habitat types. Subalpine fir or mountain hemlock habitat types with clintonia or menziesia in the understory are best represented.
North Idaho Zone Groups F, G, H, I
This type is well represented across all of the 3 National Forests in this zone, but is most extensive on cold subalpine fir habitat types (Group I) on the Idaho Panhandle and Clearwater National Forests. This zone includes the Clearwater, Idaho Panhandle and Nez Perce National Forests.

Forest Types
Engelmann spruce/subalpine fir, mountain hemlock/subalpine fir

Minimum Characteristics
10 trees per acre 17 inches DBH or more
Large trees 150 years old or more
Basal area 80 ft^2 per acre or more
Sample size: 4275 plots

Site Description
This old growth type occupies moist and cold environments from 4000 feet in frost pocket situations to 7300 feet on sheltered northerly aspects. Subalpine fir and mountain hemlock are the climax dominants on the coldest sites. Mountain hemlock is limited to moist cold sites from the Middle Fork of the Clearwater River and northward. Western hemlock and western red cedar are climax dominants on warmer, lower elevation sites in the northern part of the zone. Cedar and western hemlock habitat types are the most productive and can support greater tree stocking. Prior to 1900, infrequent stand replacing wildfires in moist subalpine fir habitat types at intervals of 100 years or more favored growth of the shade tolerant climax species. Frost tolerant subalpine fir, western hemlock and Engelmann spruce are also important seral species when disturbance creates openings in low lying areas that impound cold air.

Vegetation Characteristics
This type is most often multistoried. A single canopy layer can occur in stands of pure Engelmann spruce in early seral stages. Multiple canopy layers are common in late seral stands as climax tree species grow up beneath a seral overstory, or in climax stands with shade tolerant subalpine fir or mountain hemlock in both overstory and understory. Engelmann spruce is less shade tolerant, but is a common seral associate. This old growth type can maintain old growth characteristics for long periods in the absence of fire.

The average age of the largest trees in this type is 202 years, with a range from 188 to 220. Subalpine fir and spruce on wet cedar habitat types (Group F) develop rot early and seldom reach ages of more than 190 years. Individual trees of other more long lived species may reach an age of 400 to 500 years. There are an average of 39 trees per acre 17 inches DBH or more. The range of means across forests and forest types is from 34 to 51. The wettest subalpine fir habitat types (Group H) support the most large trees per acre, averaging 42 to 51. The average basal area is 184 ft^2 per acre. The range is 165 to 229 ft^2.

The average number of dead standing trees 9 inches or more DBH is 18 with a range of 6 to 36. Wet subalpine fir habitat types (Group H) average 22 snags per acre. The average percent of trees 9 inches or more DBH with dead or broken tops is 8 with a range of 5 to 36 in means across forests and forest types. Wet subalpine fir habitat types average 22 percent. The average percent of trees showing decay is 12, with a range of 5 to 28. Wet subalpine fir or western red cedar habitat types (Groups H, F) show

the greatest decay, averaging 24 and 27 percent. The probability of rotten down log pieces 9 inches or more in diameter is high. Average litter and duff depth is about 2 inches.

NORTH IDAHO ZONE:
Old Growth Type Code 6
Whitebark pine forest type
on cold environments

Habitat Types, Groups, and Geographic Distribution
Subalpine fir and mountain hemlock habitat types
North Idaho Zone Groups I, J, K
This type is of limited extent on all of the 3 National Forests in this zone, but has been sampled only on the Idaho Panhandle and Nez Perce. These Forests include the Clearwater, Idaho Panhandle and the Nez Perce.

Forest Types
Whitebark pine

Minimum Characteristics
5 trees per acre 13 inches DBH or more
Large trees 150 years old or more
Basal area: 60 ft^2 per acre or more for Habitat Type Groups I and J;
40 ft^2 per acre or more for Habitat Type Group K
Sample size: 43 plots

Site Description
This old growth type occupies moist and dry cold upper elevation environments on all aspects at elevations from 5500 to 7600 feet or more. Subalpine fir is the climax dominant on sites too dry to support mountain hemlock. Mountain hemlock is the climax dominant on cold moist sites from the Middle Fork Clearwater River drainage and northward. Habitat types with menziesia and clintonia dominated understories (Habitat Type group I) are the most productive and can support greater tree stocking. Prior to 1900, repeated fires at intervals of less than 100 to 150 years favored the occurrence of whitebark pine stands. Fire suppression has resulted in conversion of many stands to subalpine fir and mountain pine beetle epidemics have increased fuel loadings to whitebark pine stands with increased potential for higher intensity fires.

Vegetation Characteristics
This type may be single or multistoried. A single canopy layer is most common in stands of pure whitebark pine. Multiple canopy layers are more common in stands of whitebark pine and understory trees of more shade tolerant species, like Engelmann spruce or subalpine fir. Large whitebark pine dominate these habitat types where cold and frequent fire favor its occurrence as a seral species. This old growth type can maintain old growth characteristics for short periods until it is replaced by late seral Engelmann spruce or climax subalpine fir or mountain hemlock.

The average age of the largest trees in this type is 276 years, with a range from 183 to 295. Individual trees may reach an estimated age of 500 years. There are an average of 54 trees per acre 13 inches DBH or more. The range of means across forests and forest types is from 32 to 66. Lower values in the range are associated with drier environments (Habitat Type group J). The average basal area is 138 ft^2 per acre. The range is 103 to 170 ft^2. Lower basal areas are associated with drier environments in this old growth type.

The average number of dead standing trees 9 inches or more DBH is 35 with a range of 11 to 42. The average percent of trees 9 inches or more DBH with dead or broken tops is 7 with a range of 0 to 17 in means across forests and forest types. The average percent of trees showing decay is 9, with a range of 6 to 17. The probability of rotten down log pieces 9 inches or more in diameter is moderate. Average litter and duff depth is 1 to 2 inches.

Types Currently Lacking Data

The whitebark pine forest type on harsh, high elevation habitat types (Habitat Type group K) is known to occur, but has not been sampled. This old growth type is expected to be similar to the type described above, but the minimum basal area has been described as 40 ft^2 per acre instead of 60.

NORTH IDAHO ZONE:
Old Growth Type Code 7
Western red cedar forest type on moist environments

Habitat Types, Groups and Geographic Distribution
Western red cedar and western hemlock habitat types. Western red cedar and western hemlock habitat types with oak fern in the understory are best represented, but a variety of cedar and hemlock habitat types are present.
North Idaho Zone Groups F, G, G1
This type is well represented on the Idaho Panhandle and Clearwater National Forests and occurs on the Nez Perce National Forest primarily in the Selway River drainage. Forests in the North Idaho zone include the Clearwater, Idaho Panhandle and the Nez Perce.

Forest Types
Western red cedar

Minimum Characteristics
10 trees per acre: 25 inches DBH or more for cedar;
21 inches DBH or more for old DF, GF, L, WH, WP, or PP;
17" inches DBH or more for old SAF or MAF.
Large trees 150 years old or more
Basal area 120 ft^2 per acre or more
Sample size: 5865 plots

Site Description
This old growth type occupies moist environments from 1500 to 5500 feet elevation on all aspects and slope positions that are protected from summer drought. Western hemlock is the climax dominant on sites above about 2500 feet, in areas of adequate summer moisture from the North Fork of the Clearwater River northward. Western red cedar is the climax dominant on sites slightly more prone to summer drought or winter cold. These sites are highly productive and can grow larger trees and support higher basal areas than other habitat types in the North Idaho Zone. Infrequent stand replacing wildfires at more than 200 year intervals favor development of long lived seral and climax stands on these sites.

Vegetation Characteristics
This type may be single or multistoried. A single canopy layer is most common in stands of pure western hemlock or cedar that can develop rapidly after disturbance on favorable sites. Multiple canopy layers are more common in climax conditions where tree mortality has created openings that have filled with young trees. Large western red cedar may be a seral dominant on western hemlock sites. This old growth type can maintain old growth characteristics for long periods in the absence of fire.

The minimum diameter for this type is meant to apply when both the forest type and the actual large old trees are cedar. Because of the way forest type is computed (usually plurality of basal area), the forest type may show as cedar, but in some cases the large old trees may be a different species. In that case, use the minimum criteria appropriate on these habitat types for the species of the large old trees being considered.

The average age of the largest trees in this type is 222 years, with a range from 184 to 261. Individual trees may reach an estimated age of 800 years. There are an average of 24 trees per acre 25 inches DBH or more. The range of means across forests and forest types is from 23 to 37. The average basal area is 285 ft^2 per acre. The range is 268 to 330 ft^2.

The average number of dead standing trees 9 inches or more DBH is 12 with a range of 6 to 47. The greatest variability is in cedar habitat types with Pacific yew in the understory (Habitat Type group G1). The average percent of trees 9 inches or more DBH with dead or broken tops is 6 with a range of 5 to 36 in means across forests and forest types. Percent dead and broken tops is also most variable in cedar habitat types with Pacific yew in the understory, ranging from 10 to 36 percent. The average percent of

trees showing decay is 13, with a range of 6 to 55. Highest incidence of decay is in the cedar habitat types with fern understories or with Pacific yew understories, ranging from 27 to 55 percent. The probability of rotten down log pieces 9 inches or more in diameter ranges from low to high depending upon successional pathways, watershed-scale disturbance history, and topographic position. Average litter and duff depth is about 2 to 3 inches.

NORTH IDAHO ZONE:
Old Growth Type Code 8
Douglas-fir, western larch, Engelmann spruce/subalpine fir, mountain hemlock/subalpine fir, and white pine forest types on cold, moderately dry environments.

Habitat Types, Groups, and Geographic Distribution
Subalpine fir and mountain hemlock habitat types with beargrass, dwarf huckleberry, blue huckleberry, beargrass, grouse whortleberry, or pinegrass understories.
North Idaho Zone Groups J
This type is moderately well represented across all of the 3 National Forests in the North Idaho Zone. These Forests include the Clearwater, Idaho Panhandle and the Nez Perce.

Forest Types
Engelmann spruce/subalpine fir, mountain hemlock/subalpine fir, and Douglas-fir are major cover types. Western larch and western white pine are minor cover types.

Minimum Characteristics
10 trees per acre 17 inches DBH or more
Large trees 150 years old or more
Basal Area 60 ft^2 per acre or more
Sample size: 890 plots

Site Description
This old growth type occupies cold and moderately dry environments from 5100 feet in depressions where cold air is impounded to 7300 feet on warm exposures with well drained, coarse textured soils. Mountain hemlock is the climax dominant on cold, slightly moister sites from the Middle Fork Clearwater River drainage and northward. Mountain hemlock sites are slightly more productive. Subalpine fir is the climax dominant sites too dry to support mountain hemlock. Prior to 1900, repeated fires at intervals of 100 to 200 years favored the occurrence of stands of nearly pure Douglas-fir, western larch, or white pine. Subalpine fir or mountain hemlock may rapidly reestablish on mountain hemlock sites if seed is available.

Vegetation Characteristics
This type may be single or multistoried. A single canopy layer is most common in seral stands of Douglas-fir, larch or white pine. Multiple canopy layers are more common in late seral stands as climax tree species grow up beneath a seral overstory, or in climax stands with shade tolerant species in both overstory and understory. Douglas-fir, larch, and Engelmann spruce are seral on subalpine fir habitat types. Subalpine fir is the most common seral species on mountain hemlock sites, but Engelmann spruce, Douglas-fir, larch, and white pine may also occur. Douglas-fir, larch, and white pine forest types can maintain old growth characteristics for moderate periods until they are replaced by late seral Engelmann spruce or climax subalpine fir or mountain hemlock. Subalpine fir and Engelmann spruce forest types can maintain old growth characteristics for long periods in the absence of fire.

The average age of the largest trees in this type is 201 years, with a range from 164 to 275. Individual trees of more long lived species may reach an age of 400 to 500 years. Larch forest type has an average age of 226 to 237 years. There are an average of 34 trees per acre 17 inches DBH or more. The range of means across forests and forest types is from 13 to 54. The white pine forest type is most variable because of stand openings created by blister rust mortality. The average basal area is 186 ft^2 per acre. The range is 128 to 216 ft^2. The white pine forest type is highly variable.

The average number of dead standing trees 9 inches or more DBH is 23 with a range of 3 to 40. The larch forest type usually has the fewest snags (3 to 10 per acre) and the white pine forest type the most (34 to 40). The average percent of trees 9 inches or more DBH with dead or broken tops is 8 with a range of 1 to 14 in means across forests and forest types. The average percent of trees showing decay is 12, with a range of 1 to 15. The Engelmann spruce/subalpine fir and mountain hemlock/subalpine fir forest types have the highest incidence of decay, but all are highly variable. The probability of rotten,

down log pieces 9 inches or more in diameter is moderate in Douglas-fir, larch and white pine forest types and high in Engelmann spruce/subalpine fir and mountain hemlock/subalpine fir forest types.

NORTH IDAHO ZONE:
Old Growth Type Code 9
Engelmann spruce/subalpine fir and mountain hemlock/subalpine fir forest types on very cold, harsh environments.

Habitat Types, Groups, and Geographic Distribution
Subalpine fir and mountain hemlock habitat types with woodrush understories, alpine larch/subalpine fir and whitebark pine/subalpine fir habitat types
North Idaho Zone Group K
This type is limited to the highest elevation areas of the 3 National Forests in the North Idaho Zone, but has been sampled only on the Clearwater and Idaho Panhandle National Forests. This zone includes the Clearwater, Idaho Panhandle, and Nez Perce National Forests.

Forest Types
Engelmann spruce/subalpine fir, mountain hemlock/subalpine fir

Minimum Characteristics
5 trees per acre 13 inches DBH or more
Large trees 150 years old or more
Basal Area 40 ft^2 per acre or more
Sample size: 26 plots

Site Description
This old growth type occupies very cold and severe climates at elevations of 6000 feet in the north part of the zone to 8000 feet in the south. Snowpacks remain long into summer and trees grow deformed by snow and wind. Subalpine fir is the climax dominant on sites too dry to support mountain hemlock and at lower elevations than alpine larch and whitebark pine. Mountain hemlock is limited to moist cold sites from the Middle Fork of the Clearwater River and northward. Alpine larch/subalpine fir are incidental habitat types on the highest peaks of the Bitterroot Mountains. Whitebark pine/subalpine fir habitat types are a mosaic of timberline sites with more wind and higher snowpacks than subalpine fir habitat types. Fire suppression since 1900 has resulted in the conversion of many stands once dominated by seral whitebark pine to Engelmann spruce/subalpine fir and mountain hemlock/subalpine fir.

Vegetation Characteristics
This type is most often multistoried and trees tend to grow in clusters. A single canopy layer can occur in stands of pure Engelmann spruce, mountain hemlock or subalpine fir in early seral stages. Multiple canopy layers are common in late seral stands as climax tree species grow up beneath a seral overstory, or in climax stands with shade tolerant subalpine fir or mountain hemlock in both overstory and understory. Subalpine fir is a climax dominant on subalpine fir habitat types and seral on mountain hemlock. It usually grows in close association with whitebark pine and alpine larch on those habitat types. Mountain hemlock is climax on mountain hemlock habitat types and may rapidly reestablish on these sites after disturbance. Engelmann spruce is less shade tolerant, but is a common seral associate. This old growth type can maintain old growth characteristics for long periods in the absence of fire.

The average age of the largest trees in this type is 193 years, with a range from 190 to 195. In the limited sample, individual trees seldom reached an age of 300 years. There are an average of 79 trees per acre 13 inches DBH or more. The range of means across forests and forest types is from 77 to 81. The average basal area is 209 ft^2 per acre. The range is 176 to 223 ft^2. The number of large trees per acre and the basal area from the limited sample are higher than expected, and may not reflect the many openings in stands of this old growth type.

The average number of dead standing trees 9 inches or more DBH is 11 with a range of 11 to 13. The average percent of trees 9 inches or more DBH with dead or broken tops is 22 with a range of 21 to 23 in means across forests. This high amount of dead and broken tops is associated with snow and wind damage. The average percent of trees showing decay is 28, with a range of 13 to 35. The probability of

rotten, down log pieces 9 inches or more in diameter is moderate. Average litter and duff depth is 1 to 2 inches.

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Tab A: Habitat Type Groups for Northern Idaho

Habitat Type Group	Group Code	Alpha Code	Numeric Code
	A	PIPO/AGSP	130
		PIPO/FEID	140
		PIPO/SYAL	170
		PSME/AGSP	210
		PSME/FEID	220
	B	PIPO/PHMA	190
		PSME/PHMA	260
		PSME/PHMA-SMST	263
		PSME/PHMA-PHMA	261
		PSME/SYAL	310
		PSME/VAGL	280
		PSME/VACA	250
		PSME/CARU	320
		PSME/CARU-ARUV	322
		PSME/CARU-CARU	323
		PSME/CAGE	330
		PSME/SPBE	340
	C	ABGR/SETR	529
		ABGR/ASCA	516
		ABGR/ASCA-MEFE	518
		ABGR/ASCA-ASCA	517
		ABGR/CLUN	520
		ABGR/CLUN-MEFE	525
		ABGR/CLUN-PHMA	524
		ABGR/CLUN-CLUN	521
	C1	ABGR/ASCA-TABR	519
		ABGR/CLUN-TABR	526
	D	ABGR/LIBO	590
		ABGR/LIBO-XETE	592
		ABGR/LIBO-LIBO	591
		ABGR/VAGL	515
		ABGR/XETE	510
		ABGR/XETE-COOC	511
		ABGR/XETE-VAGL	512
		ABGR/CLUN-XETE	523
	E	ABGR/PHMA	506
		ABGR/PHMA-COOC	507

Habitat Type Group	Group Code	Alpha Code	Numeric Code
		ABGR/PHMA-PHMA	508
		ABGR/SPBE	505
	F	THPL/OPHO	550
		THPL/ATFI	540
		THPL/ATFI-ADPE	541
		THPL/ATFI-ATFI	542
		THPL/ADPE	560
	G	THPL/GYDR	555
		THPL/ASCA	545
		THPL/ASCA-MEFE	547
		THPL/ASCA-ASCA	546
		THPL/CLUN	530
		THPL/CLUN-MEFE	533
		THPL/CLUN-CLUN	531
		THPL/CLUN-XETE	534
		TSHE/GYDR	565
		TSHE/ASCA	575
		TSHE/ASCA-ARNU	576
		TSHE/ASCA-MEFE	577
		TSHE/ASCA-ASCA	578
		TSHE/CLUN	570
		TSHE/CLUN-ARNU	572
		TSHE/CLUN-MEFE	574
		TSHE/CLUN-CLUN	571
		TSHE/CLUN-XETE	573
	G1	THPL/CLUN-TABR	535
		THPL/ASCA-TABR	548
	H	ABLA/STAM	635
		ABLA/STAM-MEFE	636
		ABLA/STAM-LICA	637
		ABLA/CACA	650
		ABLA/CACA-LEGL	655
		ABLA/CACA-VACA	654
		ABLA/CACA-LICA	652
		ABLA/CACA-CACA	651
		TSME/STAM	675
		TSME/STAM-LUHI	676
		TSME/STAM-MEFE	677
	I	ABLA/CLUN	620

Habitat Type Group	Group Code	Alpha Code	Numeric Code
		ABLA/CLUN-CLUN	621
		ABLA/CLUN-XETE	624
		ABLA/CLUN-MEFE	625
		ABLA/MEFE	670
		ABLA/MEFE-LUHI	672
		ABLA/MEFE-VASC	674
		ABLA/MEFE-COOC	671
		ABLA/MEFE-XETE	673
		TSME/CLUN	685
		TSME/CLUN-MEFE	686
		TSME/CLUN-XETE	687
		TSME/MEFE	680
		TSME/MEFE-LUHI	681
		TSME/MEFE-XETE	682
		TSHE/MEFE	579
	J	ABLA/XETE	690
		ABLA/XETE-LUHI	694
		ABLA/XETE-VASC	692
		ABLA/XETE-COOC	693
		ABLA/XETE-VAGL	691
		ABLA/VAGL	720
		ABLA/CARU	750
		ABLA/VASC	730
		ABLA/VACA	640
		TSME/XETE	710
		TSME/XETE-LUHI	711
		TSME/XETE-VASC	713
		TSME/XETE-XETE	712
	K	ABLA-LUHI	830
		TSME/LUHI	840
		PICO/VACA	920
		PICO/XETE	925
		PICO/VASC	940
		LALY-ABLA	860
		PIAL-ABLA	850

APPENDIX D – COEUR D'ALENE NATIVE FISH STRATEGY (CNFISH)

Appendix D: CNFISH Strategy – INFISH Crosswalk

In 2002, the BLM Idaho State Director signed a memorandum of understanding with several other federal agencies, agreeing to implement the Interior Columbia Basin Ecosystem Management Project Strategy. This strategy specifies that "until administrative unit plans [RMPs] are amended or revised utilizing the ICBEMP Science in this Strategy, management will continue under current plans. This will include interim PACFISH, INFISH [Inland Native Fish Strategy] direction..." INFISH provides interim direction for protecting resident fish populations and habitat in Idaho, western Montana, eastern Washington, and eastern Oregon.

The development of the Coeur d'Alene RMP meets the specific criteria for modifying or adapting INFISH direction. The BLM Coeur d'Alene Field Office conducted a thorough analysis of INFISH and developed direction that would be applicable to management of BLM-administered public lands within the planning area. The table below is a crosswalk comparing key components of the Inland Native Fish Strategy (INFISH) with direction that will be incorporated into the Coeur d'Alene Draft RMP (CdA Native Fish Strategy or CNFISH).

In 2004, a memorandum was issued by the BLM, FS, FWS, EPA and NOAA Fisheries to transmit a document titled "A Framework for Incorporating the Aquatic and Riparian Component of the Interior Columbia Basin Strategy into BLM and Forest Service Plan Revisions (Framework)". This document provides direction for six component addressing aquatic and riparian management to be incorporated into revised plans. The components and how they are addressed in the Coeur d'Alene Draft RMP are as follows:

1. **Riparian Conservation Areas** (RCAs) are areas of particular value for aquatic conservation and where riparian-dependent resources receive management emphasis. RCAs are delineated in the CNFISH table below. Standards and guidelines for actions within RCAs are also found in the table below.

2. **Protection of Population Strongholds for Listed or Proposed Species and Narrow Endemics** is addressed in Appendix E: Conservation and Restoration Watersheds.

3. **Multiscale Analysis** is addressed in the CNFISH Strategy table below under Watershed Analysis. The potential analysis scales are basin, subbasin, watershed and project; analysis at the appropriate scale provides the context needed for decision making.

4. **Restoration Priorities and Guidance** can be found in Appendix E: Conservation and Restoration Watersheds.

5. **Management Direction (such as desired conditions or objectives)** is found in the CNFISH Strategy table below under Riparian Management Objectives (RMOs). An adaptive management approach will be used as a means to identify and achieve desired aquatic and riparian conditions. Many of the INFISH objectives have been modified for the CNFISH strategy, and additional objectives have been added. All modifications, except water temperature, are based on criteria in the Matrix of Diagnostics/Pathways and Indicators found in *A Framework to Assist in Making Endangered Species Act Determinations of Effect for Individual or Grouped Actions at the Bull Trout Subpopulation Watershed Scale.* Temperature criteria were incorporated from the *EPA Region 10 Guidance for Pacific Northwest State and Tribal Temperature Water Quality Standards.* These objectives should be considered interim, and local adjustment may and should occur based on site-specific or watershed scale analysis. Some of the interim objectives may not be attainable in all systems and local reference data will be required as a basis for modifications.

6. **Monitoring/Adaptive Management:** The monitoring strategy is currently being developed and will address protocols for both implementation and effectiveness monitoring needed to implement adaptive management.

CNFish Strategy - INFISH Crosswalk

INFISH	Original Conservation Measures	Direction in the CdA RMP (CNFish Strategy)
	INFISH wording	
Goals Maintain or Restore…	The goals are to maintain or restore:	All 8 goals will be incorporated into the RMP.
	(1) Water quality, to a degree that provides for stable and productive riparian and aquatic ecosystems	
	(2) Stream channel integrity, channel processes, and the sediment regime (including the elements of timing, volume, and character of sediment input and transport) under which the riparian and aquatic ecosystems developed.	
	(3) Instream flows to support healthy riparian and aquatic habitats, the stability and effective function of stream channels, and the ability to route flood discharges.	
	(4) Natural timing and variability of the water table elevation in meadows and wetlands.	
	(5) Diversity and productivity of native and desired non-native plant communities in riparian zones.	
	(6) Riparian vegetation to: (a) Provide an amount and distribution of large woody debris characteristic of natural aquatic and riparian ecosystems; (b) Provide adequate summer and winter thermal regulation within the riparian and aquatic zones; and (c) Help achieve rates of surface erosion, bank erosion, and channel migration characteristic of those under which the communities developed.	
	(7) Riparian and aquatic habitats necessary to foster the unique genetic fish stocks that evolved within the specific geo-climatic region.	
	(8) Habitat to support populations of well-distributed native and non-native plant, vertebrate, and invertebrate populations that contribute to the viability of riparian-dependent communities.	
Riparian Management Objectives	Apply where watershed analysis has not been done. The components of good habitat can vary across specific geographic areas. Interim	Many of the INFISH objectives have been modified for the CNFISH strategy, and additional objectives have been added. Other

INFISH	Original Conservation Measures	Direction in the CdA RMP (CNFish Strategy)
Forested and non-forested ecosystems	RMOs are considered to be the best watershed scale information available; BLM managers would be encouraged to establish site-specific RMOs through watershed analysis or site-specific analysis.	than temperature, modifications and additions are based on criteria in the Matrix of Diagnostics/Pathways and Indicators found in *A Framework to Assist in Making Endangered Species Act Determinations of Effect for Individual or Grouped Actions at the Bull Trout Subpopulation Watershed Scale.* Temperature criteria were incorporated from the *EPA Region 10 Guidance for Pacific Northwest State and Tribal Temperature Water Quality Standards.* These objectives may be adjusted and additional objectives adopted as future site-specific analysis is completed and/or new scientific information becomes available.
	(1) Pool frequency (all systems) Wetted width (ft) — #pools/Mile 10 — 96 20 — 56 25 — 47 50 — 26 75 — 23 100 — 18 125 — 14 150 — 12 200 — 9	**(1) Pool Frequency (all systems)** Wetted width (ft) — #pools/Mile 0-5 — 39 5-10 — 60 10-15 — 48 15-20 — 39 20-30 — 23 30-35 — 18 35-40 — 10 40-65 — 9 65-100 — 4 Also, pools have good cover and cool water, and only minor reduction of pool volume by fine sediment.
		(1)a. Large Pools (in adult holding, juvenile rearing and overwintering reaches where streams are > 3m in wetted width at baseflow). Each reach has many large pools > 1 meter deep.
		(1)b. Off-Channel Habitat Watershed has many ponds, oxbows, backwaters, and other off-channel areas with cover; and side channels are low energy areas.
	(2) Water temperature (all systems) No measurable increase in maximum water temperature (7-day moving average of daily maximum temperature measured as the average of the maximum daily temperature of the warmest consecutive 7-day period). Maximum water temperature below 59°F within adult holding habitat and below 48°F within spawning and rearing habitats.	**(2) Water temperature (all systems)** No measurable increase in maximum water temperature (7-day moving average of daily maximum temperature measured as the average of the maximum daily temperature of the warmest consecutive 7-day period). **(2)a. Water temperature in bull trout habitat*** i) Juvenile rearing: 12°C (55 °F) ii) Spawning: 9 °C (48 °F)

INFISH	Original Conservation Measures	Direction in the CdA RMP (CNFish Strategy)
		(2)b. Water temperature in salmonid habitat other than bull trout (mainly westslope cutthroat trout)* i) core juvenile rearing: 16 °C (61 °F) ii) migration/non-core juvenile rearing: 18 °C (64 °F) iii) migration: 20 °C (68 °F) iv) spawning, egg incubation, fry emergence: 13 °C (55 °F) *all temperatures are 7-day moving average of daily maximum temperature
	(3) Large woody debris (forested systems) >20 pieces per mile, >12 inch diameter, >35 foot length	**(3) Large woody debris (forested systems)** Current values are being maintained at >20 pieces per mile, >12 inch diameter, >35 foot length. Also, adequate sources of woody debris available for short and long term recruitment.
	(4) Bank stability (non-forested systems) >80% stable	**(4) Bank stability :** >80% of any stream reach has ≥90% stability.
	(5) Lower bank angle (non-forested systems) >75% of banks with <90 degree angle (i.e., undercut)	**(5) Lower bank angle (non-forested systems):** >75% of banks with <90 degree angle (i.e., undercut)
	(6) Width/depth ratio (all systems) <10, mean wetted width divided by mean depth	**(6) Average Wetted Width/Maximum Depth Ratio in scour pools in a reach:** ≤10
		(7) Floodplain Connectivity: Off-channel areas are frequently hydrologically linked to the main channel; overbank flows occur and maintain wetland functions, riparian vegetation and succession.
		(8) Sediment in Spawning and Incubation Areas: <12% fines (<0.85mm) in gravel; ≤20% surface fines of ≤6mm.
		(9) Substrate Embeddedness in Rearing Areas: Reach embeddedness <20%
RHCAs/ RCAs	RHCAs are portions of watersheds where riparian-dependent resources receive primary emphasis, and management activities are subject to specific standards and guidelines.	RCAs are lands that are likely to affect the condition and/or function of aquatic habitat, and may include areas adjacent to streams, ponds, lakes, wetlands, and unstable landscapes. In RCAs riparian-dependent resources receive primary emphasis, and management activities are subject to specific standards and guidelines.
	Interim RHCA widths apply where watershed analysis has not been completed. Establishment of RHCAs required completion of watershed analysis to provide the ecological	The dimensions of RCAs are best defined by local or watershed analysis. In the absence of such analysis, the following default RCA widths apply.

INFISH	Original Conservation Measures	Direction in the CdA RMP (CNFish Strategy)
	basis for the change. However, interim RHCAs may be modified by amendment in the absence of watershed analysis where stream reach or site-specific data support the change. In all cases, the rational supporting RHCA widths and their effects would be documented.	
	Category 1 – Fish bearing streams: Interim RHCAs consist of the stream and the area on either side of the stream extending from the edges of the active channel to the top of the inner gorge, or to the outer edges of the 100 year floodplain, or to the outer edges of the riparian vegetation, or to a distance equal to the height of two site-potential trees, or 300 feet slope distance (600 feet, including both sides of the stream channel), whichever is greatest.	**Category 1 – Fish bearing streams:** RCAs consist of the stream and the area on either side of the stream extending from the edges of the active channel to the top of the inner gorge, or to the outer edges of the 100 year floodplain, or to the outer edges of the riparian vegetation, or 300 feet slope distance (600 feet, including both sides of the stream channel), whichever is greatest.
	Category 2 – Permanently flowing non-fish bearing streams: Interim RHCAs consist of the stream and the area on either side of the stream extending from the edges of the active channel to the top of the inner gorge, or to the outer edges of the 100 year floodplain, or to the outer edges of the riparian vegetation, or to a distance equal to the height of one site-potential tree, or 150 feet slope distance (300 feet, including both sides of the stream channel), whichever is greatest.	**Category 2 – Permanently flowing non-fish bearing streams:** RCAs consist of the stream and the area on either side of the stream extending from the edges of the active channel to the top of the inner gorge, or to the outer edges of the 100 year floodplain, or to the outer edges of the riparian vegetation, or 150 feet slope distance (300 feet, including both sides of the stream channel), whichever is greatest.
	Category 3 - Ponds, lakes, reservoirs and wetlands greater than 1 acre: Interim RHCAs consist of the body of water or wetland and the area to the outer edges of the riparian vegetation, or to the extent of the seasonally saturated soil, or to the extent of moderately and highly unstable areas, or to a distance equal to the height of one site-potential tree, or 150 feet slope distance from the edge of the maximum pool elevation of constructed ponds and reservoirs or from the edge of the wetland, pond or lake, whichever is greatest.	**Category 3 - Ponds, lakes, reservoirs and wetlands greater than 1 acre:** RCAs consist of the body of water or wetland and the area to the outer edges of the riparian vegetation, or to the extent of the seasonally saturated soil, or to the extent of moderately and highly unstable areas, or 150 feet slope distance from the edge of the maximum pool elevation of constructed ponds and reservoirs or from the edge of the wetland, pond or lake, whichever is greatest.
	Category 4 – Seasonally flowing or intermittent streams, wetlands less that 1 acre, landslides, and landslide-prone areas: This category includes features with high variability in size and site-specific characteristics. At a minimum the interim RHCAs must include: a. the extent of landslides and landslide-prone areas b. the intermittent stream channel and the area to the top of the inner gorge c. the intermittent stream channel or	**Category 4 – Seasonally flowing or intermittent streams and wetlands less than 1 acre with riparian characteristics as defined by properly functioning condition inventory, and landslides and landslide-prone areas:** This category includes features with high variability in size and site-specific characteristics. At a minimum the RCAs must include: a. the extent of landslide and landslide-prone areas and the area from the edges of the landslide/landslide-prone area to a

INFISH	Original Conservation Measures	Direction in the CdA RMP (CNFish Strategy)
	wetland and the area to the outer edges of the riparian vegetation d. for Priority Watersheds, the area from the edges of the stream channel, wetland, landslide, or landslide prone area to a distance equal to the height of one site-potential tree, or 100 feet slope distance, whichever is greatest e. for watersheds not identified as Priority Watersheds, the area from the edges of the stream channel, wetland, landslide, landslide-prone area to a distance equal to the height of one-half site potential tree, or 50 feet slope distance, whichever is greatest.	distance of 100 feet slope distance. b. the intermittent stream channel and the area to the top of the inner gorge, or to the outer edges of the riparian vegetation, or to the area from the edges of the stream channel to a distance of 100 feet slope distance, whichever is greatest. c. the wetland area and the area to the outer edges of the riparian vegetation, or to a distance of 100 feet slope distance, whichever is greatest.
	Non-forested rangeland ecosystems Category 1 & 2 streams extent of 100 year flood plain.	Non-forested rangeland ecosystems Category 1 & 2 streams extent of 100 year flood plain.
Standards and Guidelines	Apply to all RHCAs. Standards & Guides apply to all RHCAs and to projects and activities in areas outside of RHCAs that are identified through NEPA analysis as potentially degrading RHCAs.	Standards & Guides apply to all RCAs and to projects and activities in areas outside of RCAs that are identified through NEPA analysis as potentially degrading RCAs.
RCA-1 (NEW)		Activities in RCAs will be designed to enhance, restore or maintain the physical and biological characteristics of the RCA by implementing the following: a. Activities in RCAs that are intact and functioning in a desired condition as indicated by RMOs or other measures must be designed to at least maintain that desired condition. b. Activities in RCAs that are not at or moving towards desired condition as indicated by RMOs or other measures must include a restoration component as part of the project if determined to be necessary/beneficial by a fisheries biologist, hydrologist or other aquatic specialist. c. Activities in RCAs must not result in long-term degradation to aquatic conditions. Limited short-term adverse/negative effects from activities in the RCA may be acceptable when outweighed by the long-term benefits to the RCA and aquatic resources.

INFISH	Original Conservation Measures	Direction in the CdA RMP (CNFish Strategy)
Timber Mgmt		
TM-1	Prohibit timber harvest, including fuelwood cutting, in RHCAs, except as described below. Do not include RHCAs in the land base used to determine the ASQ, but any volume harvested can be contribute to the timber sale program	Vegetation management practices may be used in RCAs only to restore or enhance physical and biological characteristics of the RCA including Riparian Management Objectives.
TM1-a	Where catastrophic events such as fire, flooding, volcanic, wind or insect damage result in degraded riparian conditions, allow salvage and fuelwood cutting in RHCAs only where present and future woody debris needs are met, where cutting would not retard or prevent attainment of the Riparian Management Objectives, and where adverse effects *on listed anadromous fish can be avoided* (can be avoided to inland native fish). For *with listed salmon or designated critical habitat* (priority watersheds), complete watershed analysis prior to salvage cutting in RHCAs. (PAC/IN)	No fuelwood cutting will be authorized within an RCA.
TM-1 b.	Apply silvicultural practices in RHCAs to acquire desired vegetation characteristics where needed to attain Riparian Management Objectives. Apply silvicultural practices in a manner that does not retard attainment of Riparian Management Objectives and that avoids adverse effects on inland native fish.	
Roads Mgmt		
RF-1	Cooperate with federal, tribal, State, and county agencies, and cost-share partners to achieve consistency in road design, operation, and maintenance necessary to attain Riparian Management Objectives.	Cooperate with federal, tribal, State, and county agencies, and cost-share partners to achieve consistency in road design, operation, and maintenance necessary to attain Riparian Management Objectives.
RF-2	For each existing or planned road, meet the Riparian Management Objectives and avoid adverse effects to inland native fish by:	For each existing or planned road (authorized across BLM-managed land or BLM easement across other lands), strive to meet the Riparian Management Objectives and avoid adverse effects to native fish.
RF-2 a.	Completing watershed analysis prior to construction of new roads or landings in RHCAs within priority watersheds.	Complete watershed or site specific analysis, prior to construction of new roads or landings in RCAs. The analysis will be done at the scale appropriate to the road and/or landing. Analysis will include the site-scale, in the context of the reach scale, and the watershed scale.
RF-2b.	Minimizing road and landing locations in RHCAs.	When practical close existing roads, and avoid constructing new roads or landings within RCAs.
RF2-c.	Initiating development and implementation of a Road Management Plan or a Transportation	Ensure that the Transportation/Travel Management Plan is consistent with RMOs.

INFISH	Original Conservation Measures	Direction in the CdA RMP (CNFish Strategy)
	Management Plan. At a minimum, address the following items in the plan: 1. Road design criteria, elements, and standards that govern construction and reconstruction. 2. Road management objectives for each road. 3. Criteria that govern road operation, maintenance, and management. 4. Requirements for pre-, during-, and post- storm inspections and maintenance. 5. Regulation of traffic during wet periods to minimize erosion and sediment delivery and accomplish other objectives. 6. Implementation and effectiveness monitoring plans for road stability, drainage, and erosion control. 7. Mitigation plans for road failures.	
RF2-d.	Avoiding sediment delivery to streams from the road surface. 1. Outsloping of the roadway surface is preferred, except in cases where outsloping would increase sediment delivery to streams or where outsloping is infeasible or unsafe. 2. Route road drainage away from potentially unstable stream channels, fills, and hillslopes.	Avoid sediment delivery to streams from the road surface. 1. Outsloping of the roadway surface is preferred, except in cases where outsloping would increase sediment delivery to streams or where outsloping is infeasible or unsafe. 2. Route road drainage away from potentially unstable stream channels, fills, and hillslopes.
RF2-e.	Avoiding disruption of natural hydrologic flow paths	When practical avoid disruption of natural hydrologic flow paths.
RF2-f.	Avoiding sidecasting of soils or snow. Sidecasting of road materials is prohibited on road segments within or abutting RHCAs in priority watersheds.	Sidecasting of road materials is prohibited on road segments within or abutting RCAs.
RF-3	Determine the influence of each road on Riparian Management Objectives. Meet Riparian Management Objectives and avoid adverse effects to inland native fish by: a. reconstructing road and drainage features that do not meet design criteria or operation and maintenance standards, or that have been shown to be less effective than designed for controlling sediment delivery, or that retard attainment of Riparian Management Objectives, or do not protect priority watersheds from increased sedimentation.	Avoid adverse effects to native fish by: a. relocating or reconstructing road and drainage features that do not meet design criteria or operation and maintenance standards, or that have been shown to be less effective than designed for controlling sediment delivery, or that delays or prevents attainment of Riparian Management Objectives within the expected, near natural period of restoration as determined by an aquatic, soils, and/or riparian specialist, or do not protect native fish from increased sedimentation.

INFISH	Original Conservation Measures	Direction in the CdA RMP (CNFish Strategy)
	b. prioritizing reconstruction based on the current and potential damage to inland native fish and their priority watersheds, the ecological value of the riparian resources affected, and the feasibility of options such as helicopter logging and road relocation out of RHCAs. c. closing and stabilizing or obliterating, and stabilizing roads not needed for future management activities. Prioritize these actions based on the current and potential damage to native inland fish in priority watersheds, and the ecological value of riparian resources affected.	b. prioritizing reconstruction based on the current and potential habitat, the ecological value of the riparian resources affected, and the feasibility of options such as helicopter logging and road relocation out of RCAs. c. closing and stabilizing or obliterating, and stabilizing roads not needed for future management activities. Prioritize these actions based on the current and potential damage to native fish, and the ecological value of riparian resources affected.
RF-4	Construct new and improve existing culverts bridges and other stream crossings to accommodate a 100-year flood, including associated bedload and debris, where those improvements would/do pose a substantial risk to riparian conditions. Substantial risk improvements include those that do not meet design and operation maintenance criteria, or that have been shown to be less effective than designed for controlling erosion, or that retard attainment of Riparian Management Objectives, or that do not protect priority watersheds from increased sedimentation. Base priority for upgrading on risks to priority watersheds and the ecological value of the riparian resources affected. Construct and maintain crossings to prevent diversion of streamflow out of the channel and down the road in the event of crossing failure.	When constructing new, replacement and reconstructed culverts, bridges, and other stream crossings accommodate a 100-year flood, including associated bedload and debris. Substantial risk improvements include those that do not meet design and operation maintenance criteria, or that have been shown to be less effective than designed for controlling erosion, or that delay attainment of Riparian Management Objectives, or that do not protect native fish habitat from increased sedimentation. Base priority for upgrading on risks to native fish and the ecological value of the riparian resources affected. Construct and maintain crossings to prevent diversion of streamflow out of the channel and down the road in the event of crossing failure.
RF-5	Provide and maintain fish passage at all road crossings of existing and potential fish-bearing streams.	Provide and maintain passage for fish and other aquatic organisms at new, replacement, and reconstructed road crossings of existing and potential fish-bearing streams, unless barriers are determined beneficial for native fish. The preferred approach is to implement streambed simulation strategies or have no crossing structure.

INFISH	Original Conservation Measures	Direction in the CdA RMP (CNFish Strategy)
Grazing Mgmt		
GM-1	Modify grazing practices (e.g., accessibility of riparian areas to livestock, length of grazing season, stocking levels, timing of grazing, etc.) that retard or prevent attainment of Riparian Management Objectives or are likely to adversely affect native inland fish. Suspend grazing if adjusted practices are not effective in meeting Riparian Management Objectives.	Range project plans, allotment management plans, and annual plans of operation shall be developed, revised, and maintained where needed to achieve the RMOs. These plans establish objectives for managing vegetation resources (including activities needed to achieve the objectives) to achieve desirable riparian conditions. This may include grazing schedule, grazing system, season of use, class of livestock, stocking levels, forage products and utilization rates, and improvements needed to achieve objectives. The results of monitoring riparian and streamside condition will be used to determine the need for change.
GM-2	Locate new livestock handling and/or management facilities outside of RHCAs. For existing livestock handling facilities inside RHCAs, assure that facilities do not prevent attainment of Riparian Management Objectives. Relocate or close facilities where these objectives cannot be met.	Locate new livestock handling and/or management facilities outside of RCAs. For existing livestock handling facilities inside RCAs, assure that facilities do not prevent attainment of Riparian Management Objectives or adversely affect native fish. Relocate or close facilities where these objectives cannot be met.
GM-3	Limit livestock trailing, bedding, watering, salting, loading, and other handling efforts to those areas and times that would not prevent or retard attainment of Riparian Management Objectives or adversely affect inland native fish.	Limit livestock trailing, bedding, watering, salting, loading, and other handling efforts to those areas and times that would not prevent or delay attainment of Riparian Management Objectives or adversely affect native fish
Recreation Mgmt		
RM-1	Design, construct, and operate recreation facilities, including trails and dispersed sites, in a manner that does not retard or prevent attainment of the Riparian Management Objectives and avoids adverse effects on inland native fish. Complete watershed analysis prior to construction of new recreation facilities in RHCAs. For existing recreation facilities inside RHCAs, assure that the facilities or use of the facilities will not prevent attainment of Riparian Management Objectives or adversely affect inland native fish. Relocate or close recreation facilities where Riparian Management Objectives cannot be met or adverse effects inland native fish cannot be avoided.	Design, construct, and operate recreation facilities, including trails and dispersed sites, in a manner that does not delay or prevent attainment of the Riparian Management Objectives and avoids adverse effects on native fish. Complete site specific watershed analysis prior to construction of new recreation facilities in RCAs. The level of watershed or site specific analysis should be commensurate with the scope and issues of the project and related aquatic resources. For existing recreation facilities inside RCAs, assure that the facilities or use of the facilities will not prevent attainment of Riparian Management Objectives or adversely affect native fish. Relocate or close recreation facilities where Riparian Management Objectives cannot be met or adverse effects on native fish cannot be avoided.
RM-2	Adjust dispersed and developed recreation practices that retard or prevent attainment of Riparian Management Objectives or adversely affect inland native fish. Where adjustment measures such as education, use limitations,	Adjust dispersed and developed recreation practices that delays or prevents attainment of Riparian Management Objectives within the expected, near natural period of restoration as determined by an aquatic, soils, and/or

INFISH	Original Conservation Measures	Direction in the CdA RMP (CNFish Strategy)
	traffic control devices, increased maintenance, relocation of facilities, and/or specific site closures are not effective in meeting Riparian Management Objectives and avoiding adverse effects on inland native fish, eliminate the practice or occupancy.	riparian specialist, or adversely affect native fish. Where adjustment measures such as education, use limitations, traffic control devices, increased maintenance, relocation of facilities, and/or specific site closures are not effective in meeting Riparian Management Objectives and avoiding adverse effects on native fish, eliminate the practice or occupancy.
RM-3	Address attainment of Riparian Management Objectives and potential effect on inland native fish in Wild and Scenic Rivers, Wilderness, and other Recreation Management plans.	Address attainment of Riparian Management Objectives and potential effect on native fish in Wild and Scenic Rivers, Wilderness, and other Recreation Management plans.
Minerals Mgmt		
MM-1	Minimize adverse affects to inland native fish from mineral operations. If a Notice Of Intent indicates that a mineral operation would be located in an RHCA, consider the effects of the activity on inland native fish in the determination of significant surface disturbance pursuant to 36 CFR 228.4. For operations in RHCAs ensure operators take all practicable measures to maintain, protect, and rehabilitate fish and wildlife habitat which may be affected by the operations. When bonding is required, consider (in the estimation of the bond amount) the cost of stabilizing, rehabilitating, and reclaiming the area of operations.	Minimize adverse affects to native fish from mineral operations. If a Notice Of Intent indicates that a mineral operation would be located in an RCA, consider the effects of the activity on native fish in the determination of significant surface disturbance pursuant 43 CFR Part 3000s. For operations in RCAs ensure operators take all practicable measures to maintain, protect, and rehabilitate fish and wildlife habitat which may be affected by the operations. When bonding is required, consider (in the estimation of the bond amount) the cost of stabilizing, rehabilitating, and reclaiming the area of operations.
MM-2	Locate structures, support facilities, and roads outside RHCAs. Where no alternative to sitting facilities in RHCAs exists, locate and construct the facilities in ways that avoid impacts to RHCAs and streams and adverse effects on inland native fish. Where no alternative to road construction exists, keep roads to the minimum necessary for the approved mineral activity. Close, obliterate, and revegetate roads no longer required for mineral or land management activities.	Locate structures, support facilities, and roads outside RCAs. Where no alternative to sitting facilities in RCAs exists, locate and construct the facilities in ways that avoid impacts to RCAs and streams and adverse effects on native fish. Where no alternative to road construction exists, keep roads to the minimum necessary for the approved mineral activity. Close, obliterate, and revegetate roads no longer required for mineral or land management activities.
MM-3	Prohibit solid and sanitary waste facilities in RHCAs. If no alternative to locating mine waste (waste rock, spent ore, tailings) facilities in RHCAs exists, and releases can be prevented and stability can be ensured, then:	Prohibit solid and sanitary waste facilities in RCAs. If no alternative to locating mine waste (waste rock, spent ore, tailings) facilities in RCAs exists, and releases can be prevented and stability can be ensured, then:
a.	analyze the waste material using the best conventional sampling methods and analytic techniques to determine its chemical and physical stability characteristics.	analyze the waste material using the best conventional sampling methods and analytic techniques to determine its chemical and physical stability characteristics.
b.	locate and design the waste facilities using the best conventional techniques to ensure mass stability and prevent the release of acid or toxic	locate and design the waste facilities using the best conventional techniques to ensure mass stability and prevent the release of acid or toxic

INFISH	Original Conservation Measures	Direction in the CdA RMP (CNFish Strategy)
	materials. If the best conventional technology is not sufficient to prevent such releases and ensure stability over the long term, prohibit such facilities in RHCAs	materials. If the best conventional technology is not sufficient to prevent such releases and ensure stability over the long term, prohibit such facilities in RCAs
c.	monitor waste and waste facilities to assure chemical and physical stability, and make adjustments to operations as needed to avoid adverse effects to inland native fish and Riparian Management Objectives.	monitor waste and waste facilities to assure chemical and physical stability, and make adjustments to operations as needed to avoid adverse effects to native fish and Riparian Management Objectives.
d.	reclaim and monitor waste facilities to assure chemical and physical stability and re-vegetation to avoid adverse effects to inland native fish, and to attain the Riparian Management Objectives.	reclaim and monitor waste facilities to assure chemical and physical stability and re-vegetation to avoid adverse effects to native fish, and to attain the Riparian Management Objectives.
e.	require reclamation bonds adequate to ensure long-term chemical and physical stability and successful re-vegetation of mine waste facilities.	require reclamation bonds adequate to ensure long-term chemical and physical stability and successful re-vegetation of mine waste facilities.
MM-4	For leasable minerals, prohibit surface occupancy within RHCAs for oil, gas and geothermal exploration and development activities where contracts and leases do not already exists, unless there are no other options for location and Riparian Management Objectives can be attained and adverse effects to inland native fish can be avoided. Adjust the operating plans of existing contracts to (1) eliminate impacts that prevent attainment of Riparian Management Objectives and (2) avoid adverse effects to inland native fish-	For leasable minerals, prohibit surface occupancy within RCAs (NSO-2 see Appendix H) where contracts and leases do not already exists, unless there are no other options for location and Riparian Management Objectives can be attained and adverse effects to native fish can be avoided. Adjust the operating plans of existing contracts to (1) eliminate impacts that prevent attainment of Riparian Management Objectives and (2) avoid adverse effects to native fish.
MM-5	Permit sand and gravel mining and extraction within RHCAs only if no alternatives exist, if the action(s) would not retard or prevent attainment of Riparian Management Objectives, and adverse effects to inland native fish be avoided.	Permit sand and gravel mining and extraction within RCAs only if no alternatives exist, if the action(s) would not delay or prevent attainment of Riparian Management Objectives within the expected, near natural period of restoration as determined by an aquatic, soils, and/or riparian specialist, and adverse effects to native fish can be avoided.
MM-6	Develop inspection, monitoring, and reporting requirements for mineral activities. Evaluate and apply the results of inspection and monitoring to modify mineral plans, leases, or permits as needed to eliminate impacts that prevent attainment of Riparian Management Objectives and avoid adverse effects on inland native fish.	Develop inspection, monitoring, and reporting requirements for mineral activities. Evaluate and apply the results of inspection and monitoring to modify mineral plans, leases, or permits as needed to eliminate impacts that prevent attainment of Riparian Management Objectives and avoid adverse effects on native fish.

INFISH	Original Conservation Measures	Direction in the CdA RMP (CNFish Strategy)
Fire Mgmt		
FM-1	Design fuel treatment and fire suppression strategies, practices, and actions so as not to prevent attainment of Riparian Management Objectives, and to minimize disturbance of riparian ground cover and vegetation. Strategies should recognize the role of fire in ecosystem function and identify those instances where fire suppression or fuel management actions could perpetuate or be damaging to long-term ecosystem function or inland native fish.	Design and implement fire suppression strategies, practices, and actions so as not to delay or prevent attainment of Riparian Management Objectives within the expected, near natural period of restoration as determined by an aquatic, soils, and/or riparian specialist. Strategies should recognize the role of fire in ecosystem function and identify those instances where fire suppression actions could perpetuate or be damaging to long-term ecosystem function or native fish.
FM-2	Locate incident bases, camps, helibases, staging areas, helispots and other centers for incident activities outside of RHCAs. If the only suitable location for such activities is within the RHCA, an exemption may be granted following a review and recommendation by a resource advisor. The advisor will prescribe the location, use conditions, and rehabilitation requirements, with avoidance of adverse effects to inland native fish a primary goal. Use an interdisciplinary team, including a fishery biologist, to predetermine incident base and helibase locations during pre-suppression planning.	Locate incident bases, camps, helibases, staging areas, helispots and other centers for incident activities outside of RCAs. If the only suitable location for such activities is within the RCA, an exemption may be granted following a review and recommendation by a resource advisor. The advisor will prescribe the location, use conditions, and rehabilitation requirements, with avoidance of adverse effects to native fish as a primary goal. Use an interdisciplinary team, including a fishery biologist, during pre-suppression planning to predetermine incident base and helibase locations.
FM-3	Avoid delivery of chemical retardant, foam, or additives to surface waters. An exception may be warranted in situations where overriding immediate safety imperatives exist, or following a review and recommendation by a resource advisor and a fishery biologist, when the action agency determines an escape fire would cause more long-term damage to fish habitats than chemical delivery to surface waters.	Avoid delivery of chemical retardant, foam, or additives to surface waters. An exception warranted where overriding immediate safety imperatives exist. An exception may be warranted when the action agency, with concurrence from a resource advisor and a fisheries biologist, determines an escape fire would cause more long-term damage to fish habitats than chemical delivery to surface waters.
FM-4	Design prescribed burn projects and prescriptions to contribute to the attainment of the Riparian Management Objectives.	Design prescribed burn projects and prescriptions to contribute to the attainment of the Riparian Management Objectives.
FM-5	Immediately establish an emergency team to develop a rehabilitation treatment plan to attain Riparian Management Objectives and avoid adverse effects on native inland fish whenever RHCAs are significantly damaged by wildfire, suppression activities or prescribed fire burning out of prescription.	
Lands		
LH-1	Require instream flows and habitat conditions for hydroelectric and other surface water development proposals that maintain or restore riparian resources, favorable channel conditions, and fish passage, reproduction and	Require instream flows and habitat conditions for hydroelectric and other surface water development proposals that maintain or restore riparian resources, favorable channel conditions, and fish passage, reproduction and

INFISH	Original Conservation Measures	Direction in the CdA RMP (CNFish Strategy)
	growth. Coordinate this process with the appropriate State agencies. During re-licensing of hydroelectric projects, provide written and timely license conditions to the Federal Energy Regulatory Commission (FERC) that require fish passage and flows and habitat conditions that maintain/restore riparian resources and channel integrity. Coordinate re-licensing projects with the appropriate State agencies.	growth. Coordinate this process with the appropriate State agencies. During re-licensing of hydroelectric projects, provide written and timely license conditions to the Federal Energy Regulatory Commission (FERC) that require fish passage and flows and habitat conditions that maintain/restore riparian resources and channel integrity. Coordinate re-licensing projects with the appropriate State agencies.
LH-2	Locate new hydroelectric ancillary facilities outside RHCAs. For existing ancillary facilities inside the RHCA that are essential to proper management, provide recommendations to FERC to assure that the facilities would not prevent attainment of the Riparian Management Objectives and that adverse effects on inland native fish are avoided. Where these objectives cannot be met, provide recommendations to FERC that such ancillary facilities should be relocated. Locate, operate and maintain hydroelectric facilities that must be located in RHCAs to avoid effects that would retard or prevent attainment of the Riparian Management Objectives and avoid adverse effects on inland native fish.	Locate new hydroelectric ancillary facilities outside RCAs. For existing ancillary facilities inside the RCA that are essential to proper management, provide recommendations to FERC to assure that the facilities would not prevent attainment of the Riparian Management Objectives and that adverse effects on native fish are avoided. Where these objectives cannot be met, provide recommendations to FERC that such ancillary facilities should be relocated. Locate, operate and maintain hydroelectric facilities that must be located in RCAs to avoid effects that would delay or prevent attainment of the Riparian Management Objectives and avoid adverse effects on native fish.
LH-3	Issue leases, permits, rights-of-way, and easements to avoid effects that would retard or prevent attainment of the Riparian Management Objectives and avoid adverse effects on inland native fish. Where the authority to do so was retained, adjust existing leases, permits, right-of-way, and easements to eliminate effects that would retard or prevent attainment of the Riparian Management Objectives or adversely affect native aquatic species and/or water quality. Priority for modifying existing leases, permits, right-of-way and easements would be based on the current and potential adverse effects on inland native fish, and the ecological value of the riparian resources affected.	Issue leases, permits, rights-of-way, and easements to avoid effects that would delay or prevent attainment of the Riparian Management Objectives and native fish. Where the authority to do so was retained, adjust existing leases, permits, right-of-way, and easements to eliminate effects that would delay or prevent attainment of the Riparian Management Objectives or adversely affect native aquatic species and/or water quality. Priority for modifying existing leases, permits, right-of-way and easements would be based on the current and potential adverse effects on native fish, and the ecological value of the riparian resources affected.
LH-4	Use land acquisition, exchange and conservation easements to meet Riparian Management Objectives and facilitate restoration of fish stocks and other species at risk of extinction.	Use land acquisition, exchange and conservation easements to meet Riparian Management Objectives and facilitate restoration of fish stocks and other species at risk of extinction.
General Riparian Area Mgmt		
RA-1	Identify and coordinate with Federal. Tribal, State and local governments to secure instream flows needed to maintain riparian resources, channel conditions and aquatic habitat.	Identify and coordinate with Federal. Tribal, State and local governments to secure instream flows needed to maintain riparian resources, channel conditions and aquatic habitat.

INFISH	Original Conservation Measures	Direction in the CdA RMP (CNFish Strategy)
RA-2	Trees may be felled in RHCAs when they pose a safety risk. Keep felled trees on site when needed to meet woody debris objectives.	Trees may be felled in RCAs when they pose a safety risk. Keep felled trees on site when needed to meet woody debris objectives.
RA-3	Apply herbicides, pesticides, and other toxicants, and other chemicals in a manner that does not retard or prevent attainment of Riparian Management Objectives and avoids adverse effects on inland native fish.	Apply herbicides, pesticides, and other toxicants, and other chemicals in a manner that does not delay or prevent attainment of Riparian Management Objectives within the expected, near natural period of restoration as determined by an aquatic, soils, and/or riparian specialist, and avoids adverse effects on native fish.
RA-4	Prohibit storage of fuels and other toxicants within RHCAs. Prohibit refueling within RHCAs unless there are no other alternatives. Refueling sites within an RHCA must be approved by the Forest Service or Bureau of Land Management and have an approved spill containment plan.	Prohibit storage of fuels and other toxicants and refueling within RCAs unless there are no other practicable alternatives. Refueling sites and storage areas within an RCA must be approved and have an approved spill containment plan.
RA-5	Locate water drafting sites to avoid adverse effects to inland native fish and instream flows, and in a manner that does not retard or prevent attainment of Riparian Management Objectives.	Locate water drafting sites to avoid adverse effects to native fish and instream flows, and in a manner that does not delay or prevent attainment of Riparian Management Objectives within the expected, near natural period of restoration as determined by an aquatic, soils, and/or riparian specialist.
Watershed and Habitat Restoration		
WR-1	Design and implement watershed restoration projects in a manner that promotes the long-term ecological integrity of ecosystems, conserves the genetic integrity of native species, and contributes to attainment of Riparian Management Objectives.	Design and implement watershed restoration projects in a manner that promotes the long-term ecological integrity of ecosystems, conserves the genetic integrity of native species, and contributes to attainment of Riparian Management Objectives.
WR-2	Cooperate with Federal, State, local and Tribal agencies and private landowners to develop watershed-based Coordinated Resource Management Plans (CRMPs) or other cooperative agreements to meet Riparian Management Objectives.	Cooperate with Federal, State, local and Tribal agencies and private landowners to develop watershed-based Coordinated Resource Management Plans (CRMPs) or other cooperative agreements to meet Riparian Management Objectives.
Fisheries and Wildlife Restoration		
FW-1	Design and implement fish and wildlife habitat restoration and enhancement actions in a manner that contributes to attainment of Riparian Management Objectives.	Design and implement fish and wildlife habitat restoration and enhancement actions in a manner that contributes to attainment of Riparian Management Objectives.
FW-2	Design, construct, and operate fish and wildlife interpretive and other user-enhancement facilities in a manner that does not retard or prevent attainment of the Riparian Management Objectives or adversely affect inland native fish. For existing fish and	Design, construct, and operate fish and wildlife interpretive and other user-enhancement facilities in a manner that does not delay or prevent attainment of the Riparian Management Objectives or adversely affect native fish. For existing fish and wildlife

INFISH	Original Conservation Measures	Direction in the CdA RMP (CNFish Strategy)
	wildlife interpretive and other user-enhancement facilities inside RHCAs, assure the Riparian Management Objectives are met and adverse effected on inland native fish are avoided. Where Riparian Management Objectives cannot be met or adverse effects on inland native fish avoided, relocate or close such facilities.	interpretive and other user-enhancement facilities inside RCAs, assure the Riparian Management Objectives are met and adverse effected on native fish are avoided. Where Riparian Management Objectives cannot be met or adverse effects on native fish avoided, relocate or close such facilities.
FW-3	Cooperate with Federal, and State wildlife management agencies to identify and eliminate wild ungulate impacts that prevent attainment of the Riparian Management Objectives or adversely affect inland native fish.	Cooperate with Federal, and State wildlife management agencies to identify and eliminate wild ungulate impacts that prevent attainment of the Riparian Management Objectives or adversely affect native fish.
FW-4	Cooperate with Federal, and State fish management agencies to identify and eliminate adverse effects on native anadromous fish associated with habitat manipulation, fish stocking, fish harvest, and poaching.	Cooperate with Federal, and State fish management agencies to identify and eliminate adverse effects on native anadromous fish associated with habitat manipulation, fish stocking, fish harvest, and poaching.
Conservation and Restoration Watersheds	Areas in good condition would serve as anchors for the potential recovery of depressed stocks, and also would provide colonists for adjacent areas where habitat had been degraded by land management or natural events. Those areas of lower quality habitat with high potential for restoration would become future sources of good habitat with the implementation of a comprehensive restoration program. Priority watersheds would have the highest priority for restoration, monitoring and watershed analysis.	Determine what watersheds are "Conservation" watersheds and which ones are "Restoration" watersheds. See Appendix E
Restoration Watershed Criteria	1. Watersheds with stocks listed pursuant to the Endangered Species Act, or stocks identified in the 1991 American Fisheries Society report as "at risk". 2. Watersheds that contain excellent habitat for mixed salmonid assemblages. 3. Degraded watersheds with a high restoration potential.	
Conservation watershed criteria	1. Watersheds with excellent habitat or strong assemblages of inland native fish, with a priority on bull trout populations. 2. Watersheds that provide for meta-population objectives. 3. Degraded watersheds with high restoration potential.	

INFISH	Original Conservation Measures	Direction in the CdA RMP (CNFish Strategy)
Watershed Analysis – Biological Opinion	Priority watersheds are highest priority for watershed analysis. Complete watershed analysis in existing INFISH priority watersheds, and special emphasis watersheds. Project decisions will be guided by the results of watershed analysis.	When feasible the BLM will coordinate with the FS with their watershed analysis schedule but BLM will not be a lead on watershed analysis due to our scattered land patterns. For small tracts of federal land associated with high value salmonid habitats, the BLM will use focused analysis at the reach, watershed, or subbasin scales.[1]
Watershed Analysis - Biological Opinion	As part of watersheds analyses, road inventories, and other appropriate information will be used to collaborate with NOAA and FWS in developing restoration strategies. Restoration strategies will be used to identify key processes needing attention, prioritize key locations and project types, address implementation and scheduling issues and provide a preliminary estimate of costs. These strategies will serve as the primary framework for implementation of integrated restoration activities. (BO).	Roads analysis is part of the plan revision and will continue to be a part of larger watershed assessments.
Road Inventories Biological Opinion	Continue updating road inventories.	Current road inventories are being used as part of the base for plan revision.
Watershed Restoration Biological Opinion	The FS and BLM in cooperation with NOAA-Fisheries and the USFWS will develop and implement strategies that will integrate and coordinate restoration, protection, and evaluation measures (construction/maintenance, flood repair, watershed and fish habitat improvements, etc.) to expeditiously achieve restoration objectives at multiple scales. Restoration opportunities will be identified through an agreed upon approach using existing funding, information and programs, and incorporating new information as it becomes available. *The Interim Watershed Restoration Strategy was completed in May, 2000 and is available to the field units.*	The Cd'A RMP will include conservation and restoration strategies/themes for watersheds. See Appendix E.
Monitoring Biological Opinion	Monitoring is an important component of the proposed interim direction. The primary focus is to verify that the standards and guidelines were applied during the project implementation.	Cd'A BLM monitoring will address effectiveness of implementing standards and guidelines.

[1] As described in the FS/BLM memorandum dated July 29, 2004: Clarification of NMFS and USFWS 1998 Biological Opinion Requirements for completing Watershed Analysis (PACFISH, INFISH) and Subbasin Assessments (PACFISH only)

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U.S. Environmental Protection Agency. 2003. EPA Region 10 Guidance for Pacific Northwest State and Tribal Temperature Water Quality Standards. EPA 910-B-03-002. Region 10 Office of Water, Seattle, WA.

U.S. Fish and Wildlife Service. 1998. A Framework to Assist in Making Endangered Species Act Determinations of Effect for Individual and Grouped Actions at the Bull Trout Subpopulation Watershed Scale.

APPENDIX E – CONSERVATION AND RESTORATION WATERSHEDS

Appendix E: Conservation and Restoration Watersheds

Conservation Area Designation

Conservation areas are the subwatersheds in which current watershed processes and conditions have resulted in natural landscape patterns. Hydrologic function, such as sediment amounts and stream flow regimes resulting from disturbances are within a natural range of frequency, duration, and intensity. Waters are meeting designated or existing beneficial uses. High quality water is common to provide both current and future public drinking water supplies. Land uses and human activities do not strongly influence landscape pattern or hydrologic function, as indicated by low road density and few stream crossings. Examples of conservation areas include wilderness and many of the roadless subwatersheds.

As a general rule minimal investment over time is needed to maintain function and critical instream and upland habitat elements in these conservation-designated watersheds.

Restoration Area Designation

Restoration areas are the subwatersheds where biological and physical processes and conditions do not reflect natural patterns because of past and long-term land disturbances. These disturbances are a result of past activities such as extensive roads network, timber harvest near stream channels, stream channel changes caused by mining, and riparian damage due to unmanaged livestock grazing. The common effect of these disturbances are long-term (decades) increase of sediment deposition in streams, loss of large woody debris recruitment to stream channels, abnormal hydrologic patterns (water flows), and elevated water temperatures. Cumulative impacts from human caused disturbances and periodic natural events such as large fires, landslides, and floods exacerbate abnormal watershed and biological conditions.

Active management is required to restore the physical and biological function to their natural range of frequency, duration, and intensity. Identification and assessment of the significant adverse impacts to habitat will allow managers to focus restoration efforts in the most cost effective manner to achieve hydrologic and biological recovery. This implies that 1) there is a range of treatment intensities and desired landscape responses, and 2) not all impacts need be treated to achieve goals.

Priority Designations

Primary issues considered in ranking status and risks are water quality, riparian habitat, existing aquatic species diversity, and potential fisheries habitats productivity. Opportunities considered the expected cost and response time to effect measurable changes toward achieving goals.

Population Strongholds

Watersheds of value for protection of populations of federally listed and proposed aquatic species and narrow endemics (i.e. population strongholds) were ranked high priority. The intent is that strongholds will provide high quality habitat for species and support expansion and recolonization of species to adjacent watersheds. Population strongholds may be added, deleted, or modified, based on new information.

High Priority Criteria – Conserve Area Designation

1. Population strongholds for federally listed and proposed aquatic species and narrow endemics, based on high genetic integrity, connectivity of subpopulations, and restoration/expansion potential into adjacent watersheds OR;
2. Fish species assemblages contribute to high biological diversity. Habitats support productive or unique populations and key salmonid species exhibit full range of life history diversity. The assumption is that the aquatic community is largely intact, and is a potential source of individuals to nearby recovering populations AND;
3. Water quality supports designated and existing beneficial uses; OR
4. Municipal (public) water supplies.

Moderate Priority Criteria – Conserve Area Designation

1. Fish species assemblages represent moderate biological diversity AND;
2. Water quality supports designated and existing beneficial uses.

High Priority Criteria – Restore Area Designation

1. Population strongholds for federally listed and proposed aquatic species and narrow endemics, based on high genetic integrity, connectivity of subpopulations, and restoration/expansion potential into adjacent watersheds OR;
2. Habitat potential for highly productive or unique fish communities with restoration efforts. Loss of connected populations, competition or genetic introgression with non-native species has caused the loss of diversity of some unique populations such as key salmonids species. The assumption is that the aquatic community is largely intact, but not resilient to landscape disturbance events, nor provides a source of individuals to nearby recovering populations AND;
3. Water quality may not support all designated and existing beneficial uses OR;
4. Municipal (public) water supply.

Moderate Priority Criteria – Restore Area Designation

1. Potential for moderately productive fish habitat with restoration efforts. Long-term loss of connected populations, competition or genetic introgression with non-native species has caused the loss of diversity of some unique populations such as key salmonids species. The assumption is that the aquatic community is largely intact, but not resilient to landscape disturbance events, nor provides a source of individuals to nearby recovering populations AND;
2. Water quality may not support all designated and existing beneficial uses OR;
3. Municipal (public) water use is a future possibility.

Low Priority Criteria – Restore Area Designation

1. There is a minor amount of fish habitat. Long-term loss of connected populations, competition or genetic introgression with non-native species has caused the loss of diversity of key salmonids species. The assumption is that the aquatic community is not intact, and not highly resilient to natural events, nor provides a source of individuals to nearby recovering populations AND;
2. Water quality may not support all designated and existing beneficial uses AND;
3. Municipal (public) water is not considered as a future use.

Coeur d'Alene Field Office Conservation and Restoration Watersheds

6th Field HUC Number	Subwatershed Name	Management Objective	Priority
Little North Fork Clearwater			
170603080904	Lund Creek	Conservation	High*
	Little Lost Creek	Conservation	High*
South Fork Coeur d'Alene			
170103020501	Mainstem Pine Creek, below confluence	Restoration	Moderate
	East Fork Pine Creek	Restoration	High
	West Fork Pine Creek	Restoration	Moderate
	Highland Creek	Restoration	Moderate
	Hunter Creek	Restoration	Moderate
170103020301	West Fork Ninemile Creek	Restoration	Moderate
170103020202	Placer Creek	Restoration	High
170103020401	Rock Creek	Restoration	Moderate
Coeur d'Alene Lake			
17010303	Upper Latour Creek	Conservation	Moderate

6th Field HUC Number	Subwatershed Name	Management Objective	Priority
St. Joe River			
170103040801	Rochat Creek	Conservation	Moderate

*Population Strongholds for bull trout, as delineated in the draft Bull Trout Recovery Plan.

It is possible that the BLM may pick a watershed not listed in the table for restoration work, especially if there are partnership opportunities. Priorities may change as we receive new information such as new listing or delisting of species under the Endangered Species Act. Watersheds not currently prioritized and listed on the table are those where BLM ownership is relatively minor, isolated, or otherwise limits opportunities for effective restoration projects.

APPENDIX F – MINERAL LEASING STIPULATIONS

Appendix F: Mineral Leasing Surface Use Stipulations

Apply only to mineral leasing.

Definitions:

No Surface Occupancy (NSO) = Closed to placement of surface facilities or any surface disturbing activity

Controlled Surface Use (CSU) = Activity is only subject to restraints specified in the stipulation description

Timing Limitation (TL) = Activity is subject to restraints during the time period specified in the stipulation description (i.e. seasonal).

Exception = One-time exemption

Modification = Change to the language or provisions

Waiver = Permanent exemption

Stip	Protected Resource	Acres Alt B	Acres Alt C	Acres Alt D	Description
NSO-1	ACEC WSR (Wild)	77	5,599	458	*Stipulation:* Surface occupancy is prohibited within all ACECs to protect natural processes and historic, cultural, scenic, fisheries, and wildlife resources; or to protect the public from natural hazards; and within river corridors suitable for wild designation under the WSR Act to protect special values. *Exception:* The authorized officer may grant an exception if an environmental analysis of a proposed action reveals that these values would not be impacted, or that impacts could be adequately mitigated. *Modification:* The boundaries of the stipulated area may be modified if the ACEC or suitable river corridor boundaries are modified. *Waiver:* The stipulation may be waived if the ACEC designation is lifted.

Stip	Protected Resource	Acres Alt B	Acres Alt C	Acres Alt D	Description
NSO-2	Fisheries, Special Status Fish, Aquatic Species, Riparian and Wetland Vegetation	9,099	9,099	9,099	*Stipulation*: Surface occupancy is prohibited within: • 91 meters (300 feet) of fish-bearing streams • 46 meters (150 feet) of permanently flowing non-fish bearing streams, • 46 meters (150 feet) of ponds, lakes, reservoirs, and wetlands greater than 1 acre *Exception*: The authorized officer may grant an exception if an environmental assessment reveals that a proposed action may affect but is not likely to adversely affect a special status species, or concurrence is obtained from the USFWS (through applicable provisions of the Endangered Species Act), to allow an adverse effect to a listed species. *Modification*: Buffer distances may change based on monitoring and scientific research. *Waiver*: None.
NSO-3	Cultural Resources	2,870	0	2,897	*Stipulation*: Surface occupancy is prohibited within areas of cultural or spiritual value to Native American Tribes. *Exception*: The authorized officer may grant an exception if environmental analysis and Tribal consultation on a proposed action reveals that these values would not be impacted, or that impacts could be adequately mitigated. *Modification*: Through Tribal consultation, the boundaries of these areas may be changed. *Waiver*: This stipulation may be waived with written approval from the concerned Native American Tribal Councils.

Stip	Protected Resource	Acres Alt B	Acres Alt C	Acres Alt D	Description
NSO-4	Raptor Nests	1,567	1,567	1,567	*Stipulation*: Surface occupancy is prohibited within 1/2 mile of identified nests. *Exception*: The authorized officer may grant an exception if concurrence is obtained from the USFWS (through applicable provisions of the Endangered Species Act, Eagle Protection Act, or Migratory Bird Treaty Act), to interrupt active nesting attempts and/or cause short or long term adverse modification of suitable nest site characteristics. An exception may also be granted by the authorized officer if environmental analysis of a proposed action reveals that it would not impair the function or utility of the nest site for current or subsequent nest activities or occupancy. *Modification*: The area of application of the NSO may be modified pending determination that a portion of the NSO area is not essential to nest site functions or utility; or that the nature or conduct of the activity, as proposed or conditioned, would not impair the function or utility of the nest site for current or subsequent nest activities or occupancy. The stipulation may also be modified if the proponent, BLM, and where necessary, other affected interests, negotiate compensation that satisfactorily offsets anticipated impacts to raptor breeding activities and/or habitats. Modifications could also occur if sufficient information is provided that supports the contention that the action would not contribute to the suppression of breeding population densities or the population's production or recruitment regime from a Geographic Reference Area perspective. If a species status is downgraded, or delisted, the NSO buffer area may be modified to an appropriate level. *Waiver*: A waiver may be granted if the species becomes extinct or if site conditions change such that there is no reasonable likelihood of occupation for a subsequent minimum period of 10 years.

Stip	Protected Resource	Acres Alt B	Acres Alt C	Acres Alt D	Description
NSO-5	Special Status Plant Species and rare plant communities.	0	15,716	15,716	*Stipulation*: No surface occupancy will be allowed on known habitat of special status plant species and rare plant communities. *Exception:* The authorized officer may grant an exception if an environmental assessment reveals that a proposed action may affect but is not likely to adversely affect a special status species, or concurrence is obtained from the USFWS (through applicable provisions of the Endangered Species Act), to allow an adverse effect to a listed species. . *Modification*: The area of application may be modified based on inventory and scientific research. *Waiver*: None.
NSO-6	Public – from Hazardous Materials	51	0	148	Stipulation: No surface occupancy will be allowed in areas where hazardous materials are known to exist. Exception: The authorized officer may grant an exception if environmental analysis of a proposed action reveals that it would not further expose the public or the environment to hazardous materials. Modification: The area of application for this stipulation may change based on discovery or removal of hazardous materials. Waiver: This stipulation will be waived if all hazardous materials are removed from the area.
NSO-7	Developed Recreation Sites, Administrative Sites	2,025	2,025	2,025	Stipulation: No surface occupancy will be allowed within the vicinity of developed recreation sites or sites used for agency administrative purposes. Exception: The authorized officer may grant an exception if environmental analysis of a proposed action reveals that it would not adversely impact the use of the site. Modification: The area of application for this stipulation may change based on future site development. Waiver: This stipulation will be waived if the site is no longer used for recreational or administrative purposes.

Stip	Protected Resource	Acres Alt B	Acres Alt C	Acres Alt D	Description
CSU-1	VRM Class II	14,312	40,740	22,242	Stipulation: All surface-disturbing activities, semi-permanent and permanent facilities in VRM class II areas may require special design including location, painting, and camouflage to blend with the natural surroundings and meet the visual quality objectives of the area. Exception: None. Modification: None. Waiver: This stipulation may be waived if the authorized officer determines that there is no longer VRM Class II within the area of application.
CSU-2	Special Status Terrestrial Wildlife	39,262	39,262	39,262	Stipulation: No surface-disturbing activities, semi-permanent and permanent facilities will be authorized which may impact special status terrestrial wildlife. Exception: The authorized officer may grant an exception if an environmental assessment reveals that a proposed action may affect but is not likely to adversely affect a special status species, or concurrence is obtained from the USFWS (through applicable provisions of the Endangered Species Act), to allow an adverse effect to a listed species. Modification: The area of application for this stipulation may change based on listing of new species by USFWS, or when the status of a species changes. Waiver: This stipulation will be waived if the species of concern becomes extinct or is no longer identified as a special status species.
CSU-3	Special Recreation Management Areas, WSR (Scenic & Recreation)	55,117	40,736	59,021	Stipulation: No surface-disturbing activities semi-permanent and permanent facilities will be authorized which may adversely impact the use of these areas for recreation purposes. Exception: The authorized officer may grant an exception if environmental analysis indicates that a proposed action would not adversely impact recreational use. Modification: None. Waiver: None.

Stip	Protected Resource	Acres Alt B	Acres Alt C	Acres Alt D	Description
TL-1	Deer and Elk Winter Range	27,852	27,582	27,852	Stipulation: No construction or development activities will be allowed within deer or elk winter range between December 15 and March 31. Exception: The authorized officer may grant an exception if environmental analysis indicates that a proposed action would not adversely impact use of this habitat. Modification: Area of application for this stipulation may change based on monitoring and scientific research. Waiver: None
TL-2	Bald Eagle Winter Feeding Area	285	285	285	Stipulation: No ground disturbing activity is allowed within winter feeding areas November 15 to February 15. *Exception*: An exception may be granted by the authorized officer if concurrence is obtained from the USFWS (through applicable provisions of the Endangered Species Act, Eagle Protection Act, or Migratory Bird Treaty Act), to interrupt feeding activities and/or cause short or long term adverse modification of suitable roost site characteristics. The Area Manager may also grant an exception if an environmental analysis indicates that the nature or conduct of the action, as proposed or conditioned, would not impair the function or utility of the site for current or subsequent feeding activities. *Modification*: The stipulation may be modified if an environmental analysis indicates that a portion of the area is nonessential to winter feeding, or that the proposed action could be conditioned to not impair the function or utility of the site for current or subsequent feeding activities. The stipulation may also be modified commensurate with changes in species status. *Waiver*: The stipulation may be waived if the species becomes extinct or if the site has failed to support feeding activities over a minimum three year period. A waiver may also apply if the area has changed such that there is no reasonable likelihood of use for a subsequent minimum period of 10 years.

APPENDIX G – AREAS OF CRITICAL ENVIRONMENTAL CONCERN AND ALTERNATIVES

Appendix G: Areas of Critical Environmental Concern and the Alternatives

This appendix contains a description of how BLM determined the proposed Areas of Critical Environmental Concern (ACECs) and Research Natural Areas (RNAs) for the RMP alternatives

The first steps in the process were to identify nominations for ACECs/RNAs and determine if they met the criteria outlined in 43 CFR 1610.7-2. BLM conducted this analysis and prepared a report. This appendix contains an extract of this report. The full report is available at the CdA FO, or online at http://www.blm.gov/rmp/id/cda/. BLM determined that 21 areas met the criteria. These areas are referred to as potential ACECs/RNAs.

The next step was to determine whether the special values within each of these areas warranted designation, or whether the values were afforded appropriate protection by other management direction under each RMP alternative. Only the two RNAs that currently exist were carried forward under all alternatives. Under alternative C, all 21 areas were identified for designation to allow comparison. During development of Alternative D, BLM found that the values for 16 of the areas were protected by other management direction (see Table G-1 below). Alternative D identifies the other five areas (Farnham Forest RNA, Hideaway Islands RNA, Windy Bay RNA, Pulaski Tunnel ACEC, and Lund Creek RNA) for designation.

Table G-1: Management Direction to Protect Values of Areas Not Designated ACECs/RNAs under Alternative D

Area Not Designated	Values	Management Direction Providing Protection
Constitution Mine & Millsite	Mine tailings hazard, bioreactor safety concern, cultural	Actions to prevent public exposure to Hazardous Materials under Social and Economic - Health and Safety
Gamlin Lake	Wetland and riparian areas, Idaho BLM sensitive plant species, migratory birds	CNFISH (See Appendix D) Actions to protect special status plant species under Special Status Species Actions to protect terrestrial wildlife habitat under Fish and Wildlife
Hecla-Star Tailings Piles	Mine tailings hazard	Actions to prevent public exposure to Hazardous Materials under Social and Economic - Health and Safety
Killarney Lake	Bull trout, bald eagles, migratory birds, mine tailings hazard	CNFISH (See Appendix D) Actions to protect special status species Actions to prevent public exposure to Hazardous Materials under Social and Economic - Health and Safety Designation as a Special Recreation Management Area

Table G-1: Management Direction to Protect Values of Areas Not Designated ACECs/RNAs under Alternative D

Area Not Designated	Values	Management Direction Providing Protection
Kootenai River Front	Kootenai River sturgeon, bull trout, westslope cutthroat trout, bald eagles	CNFISH (See Appendix D) Actions to protect special status species Management of river segment as eligible for Wild and Scenic River designation
Liberal King Millsite	Historic/cultural, heavy metals hazard, mill buildings and rock dump safety concerns	Actions to prevent public exposure to Hazardous Materials under Social and Economic - Health and Safety Area designated as closed to motorized vehicle use. In accordance with 43 CFR 3809.11, to develop a mining claim within an area closed to motorized use, a plan of development must be submitted to, and approved by BLM.
Little North Fork Clearwater River	Scenic, bull trout, westslope cutthroat trout, habitat for Coeur d'Alene salamander	CNFISH (See Appendix D) Actions to protect special status species Interim management of Grandmother Mountain Wilderness Study Area Designation of the Widow Mountain Special Recreation Management Area Visual Resource Management Classes I and II designations
Morton Slough	Bald eagles, old growth ponderosa pine, habitat for BLM Sensitive wildlife	Actions to protect special status species Restrictions on vegetation treatments in the vicinity of old growth
Mother Lode Mine	Heavy metals hazard, bioreactor safety concern	Actions to prevent public exposure to Hazardous Materials under Social and Economic - Health and Safety Area designated as closed to motorized vehicle use. In accordance with 43 CFR 3809.11, to develop a mining claim within an area closed to motorized use, a plan of development must be submitted to, and approved by BLM.

Table G-1: Management Direction to Protect Values of Areas Not Designated ACECs/RNAs under Alternative D

Area Not Designated	Values	Management Direction Providing Protection
Nabob Millsite	Mine tailings hazard, mill buildings safety concern	Actions to prevent public exposure to Hazardous Materials under Social and Economic - Health and Safety Area designated as closed to motorized vehicle use. In accordance with 43 CFR 3809.11, to develop a mining claim within an area closed to motorized use, a plan of development must be submitted to, and approved by BLM.
Rex Millsite Tailings Pile	Mine tailings hazard, dam stability issue	Actions to prevent public exposure to Hazardous Materials under Social and Economic - Health and Safety Area designated as closed to motorized vehicle use. In accordance with 43 CFR 3809.11, to develop a mining claim within an area closed to motorized use, a plan of development must be submitted to, and approved by BLM.
Rochat Divide	Cultural, scenic, wolverine	Travel management limitations in cultural area Visual Resource Management Classes I and II designations. Interim Management of Crystal Lake Wilderness Study Area Designation as a Special Recreation Management Area Actions to protect special status species
Sidney Mine & Millsite	Heavy metals hazard, rock dump, bioreactor safety concern	Actions to prevent public exposure to Hazardous Materials under Social and Economic - Health and Safety Area designated as closed to motorized vehicle use. In accordance with 43 CFR 3809.11, to develop a mining claim within an area closed to motorized use, a plan of development must be submitted to, and approved by BLM.

Table G-1: Management Direction to Protect Values of Areas Not Designated ACECs/RNAs under Alternative D

Area Not Designated	Values	Management Direction Providing Protection
Wallace Landfill	Deleterious materials hazard, contaminated seepage and run-off	Actions to prevent public exposure to Hazardous Materials under Social and Economic - Health and Safety Area designated as closed to motorized vehicle use. In accordance with 43 CFR 3809.11, to develop a mining claim within an area closed to motorized use, a plan of development must be submitted to, and approved by BLM.
We-Like Mine	Heavy metals hazard, rock dump, bioreactor safety concern	Actions to prevent public exposure to Hazardous Materials under Social and Economic - Health and Safety Area designated as closed to motorized vehicle use. In accordance with 43 CFR 3809.11, to develop a mining claim within an area closed to motorized use, a plan of development must be submitted to, and approved by BLM.
Wolf Lodge Bay	Bull trout, westslope cutthroat trout, bald eagles, Coeur d'Alene salamander, migratory birds	CNFISH (See Appendix D) Actions to protect special status species Designation of Lake Coeur d'Alene Special Recreation Management Area

EXTRACT FROM THE AREAS OF CRITICAL ENVIRONMENTAL CONCERN NOMINATION EVALUATION REPORT

INTRODUCTION

The Federal Land Policy and Management Act of 1976 (FLPMA) states that the Bureau of Land Management (BLM) will give priority to the designation and protection of ACECs in the development and revision of land use plans. Land use plans in the BLM are known as Resource Management Plans (RMPs) and the Coeur d'Alene Field Office is currently in the multi-year process of developing such a plan.

This RMP will replace the Emerald Empire Management Framework Plan (MFP) that was approved in 1981 and predated BLM's current planning system. In 1981, the BLM did not identify specific areas for ACEC designation. However, in 1985, the Coeur d'Alene BLM District Manager issued an order designating the Hideaway Islands Research Natural Area (RNA)/ACEC. An RNA is an area that is established as an ACEC and is maintained for the primary purpose of research and education in accordance with 43 CFR 8223. Then in 1989 the BLM completed a land use plan amendment which designated one additional RNA/ACEC, Lund Creek.

This report describes BLM's evaluation of 19 newly nominated areas, as well as the re-evaluation of 2 existing ACECs, using the relevance and importance criteria outlined in 43 CFR 1610.7-1 (also listed in the Relevance and Importance Evaluation Section, later in this report). All evaluated areas are located on public land managed by the Coeur d'Alene Field Office. BLM completed these evaluations in accordance with guidance provided in *BLM Manual 1613 – Areas of Critical Environmental Concern.*

WHAT IS AN ACEC?

FLPMA defines an ACEC as an area "within the public lands where special management attention is required (when such areas are developed or used or where no development is required) to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources, or other natural systems or processes, or to protect life and safety from natural hazards." Therefore, private lands and lands administered by other agencies are not included in the boundaries of ACECs. The ACEC designation indicates to the public that the BLM recognizes that an area has significant values and has established special management measures to protect those values. In addition, ACEC designation also serves as a reminder that significant value(s) or resource(s) exist which must be accommodated when future management actions and land use proposals are considered near or within an ACEC.

ACECs differ from other special management designations such as Wilderness Study Areas in that designation by itself does not automatically prohibit or restrict other uses in the area. The one exception is that a mining plan of operation is required for any proposed mining activity within a designated ACEC. The ACEC designation is an administrative designation that is accomplished through the land use planning process. It is unique to the BLM in that no other agency uses this form of designation. The intent of Congress in mandating the designation of ACECs through FLPMA was to give priority to the designation and protection of areas containing truly unique and significant resource values.

THE ACEC DESIGNATION PROCESS

There are several steps in the identification and evaluation of ACECs. These steps include: (1) Nomination of existing or new areas to be considered for ACEC designation; (2) Evaluation of the nominated areas to determine if they meet the relevance and importance criteria; (3) Consideration and analysis of the potential ACECs as management alternatives in the RMP and Environmental Impact Statement (EIS); (4) Public comment on the proposed ACEC designations in the RMP/EIS; and (5) Designation of ACECs in the Record of Decision that approves the RMP. Each of these steps is further described below.

Identification/Nomination. ACECs are identified, nominated, and designated through the BLM's land use planning process. Nominations from the public are accepted as part of the scoping process during development of a land use plan. All existing ACECs are considered nominations.

Evaluation of Nominations for Relevance and Importance. Nominations are evaluated to determine whether they meet the relevance and importance criteria. For a detailed description of these criteria, see the section called Relevance and Importance Evaluation, found on page G-8. A nomination must meet one or more of the relevance and importance criteria to be considered a potential ACEC. Potential ACECs are then considered further in the planning process.

Consideration and Analysis of Potential ACECs. Potential ACECs are considered, as RMP alternatives are developed. Each potential ACEC is proposed for designation in at least one of the management alternatives. The need for special management and the resulting effects from applying such management are assessed in the associated environmental analysis (EIS). A potential ACEC is proposed for designation if the area requires special management. Special management is defined as management outside of standard or routine practices, and usually includes more detail than other prescriptions contained within the plan. Special management is usually needed when one of the following conditions is met:

- Current management or management activities proposed in the alternative are not sufficient to protect the relevant and important resource.
- The needed management action is considered unusual or outside of the normal range of management practices typically used.
- The change in management is difficult to implement without ACEC designation.

Comment on Proposed ACECs. BLM releases the Draft RMP/EIS, containing the alternatives for ACEC designation, for a 90-day public review and comment period. The public may comment on any aspect of the ACEC analysis at this point in the process. These comments are then considered in preparation of the Proposed RMP/Final EIS. The Proposed RMP/Final EIS is release to the public for a 30-day protest period. During this period the public may protest proposed land use decisions in the document, including those designating ACECs.

Designation. BLM will resolve all protest prior to preparing a Record of Decision that approves the RMP, which includes ACEC designations.

Research Natural Areas (RNA) and Outstanding Natural Areas (ONA)

ACECs may be further classified as RNAs or ONAs if they meet certain requirements for these types of designations. Those nominations which meet these requirements are identified later in this report, in the Relevance and Importance Evaluation section.

RNA: An RNA is defined in 43 CFR 8223.0-5 as "an area that is established and maintained for the primary purpose of research and education because the land has one or more of the following characteristics:

- A typical representation of a common plant or animal association;
- An unusual plant or animal association;
- A threatened or endangered plant or animal species;

- A typical representation of common geologic, soil, or water features;
- Outstanding or unusual geologic, soil, or water features."

ONA: An administratively designated ONA is an area which contains unusual natural characteristics and is managed primarily for educational and recreational purposes.

Nominations

Public scoping for the Coeur d'Alene RMP effort included solicitation of nominations for ACEC designations from the public. Scoping began with the publication of a Notice of Intent in the *Federal Register* on September 3, 2004. BLM distributed newsletters and held public scoping meetings in October 2004. In these publications and meetings, BLM solicited comments from the public on land use planning issues and planning criteria. BLM specifically identified and asked for public comment on the potential issue of special designations (ACECs and Wild and Scenic Rivers). BLM received several comments supporting the designation of ACECs in general; however, no new nominations were identified. The public scoping period officially ended on November 15, 2004.

Although the public made no nominations, the BLM interdisciplinary planning team identified 19 new areas with special values. With the two previously designated ACECs, BLM had a total of 21 nominations to evaluate. Map #46 in Volume III of the Draft Coeur d'Alene RMP/EIS shows the locations of the nominated ACECs which are:

Constitution Mine and Millsite
Farnham Forest
Gamlin Lake
Hecla-Star Tailings Piles
Hideaway Islands (existing RNA/ACEC)
Killarney Lake
Kootenai River Front
Liberal King Millsite
Little North Fork Clearwater Headwaters
Lund Creek (existing RNA/ACEC)
Morton Slough
Mother Lode Mine
Nabob Millsite
Pulaski Tunnel Historic Site
Rex Millsite Mine Tailings Pile
Rochat Divide
Sidney Mine and Millsite
Wallace Landfill
We-Like Mine
Windy Bay
Wolf Lodge Bay

RELEVANCE AND IMPORTANCE EVALUATIONS

Relevance: An area meets the relevance criteria if it contains one or more of the following:

1. A significant historic, cultural, or scenic value (including but not limited to rare or sensitive archeological resources and religious or cultural resources important to Native Americans).

2. A fish and wildlife resource (including but not limited to habitat for endangered, threatened, or sensitive species, or habitat essential for maintaining species diversity).

3. A natural process or system (including but not limited to endangered, sensitive, or threatened plant species; rare, endemic, or relic plants or plant communities which are terrestrial, aquatic, or riparian; or rare geological features).

4. Natural hazards (including but not limited to areas of avalanche, dangerous flooding, landslides, unstable soils, seismic activity, or dangerous cliffs). A hazard caused by human action may meet the relevance criteria if it is determined through the RMP process that it has become part of a natural process.

Importance: The value, resource, system, process, or hazard described in the relevance section must have substantial significance and values to meet the importance criteria. This generally means that the value, resource, system, process, or hazard is characterized by one or more of the following:

1. Has more than locally significant qualities which give it special worth, consequence, meaning, distinctiveness, or cause for concern, especially compared to any similar resource.

2. Has qualities or circumstances that make it fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened, or vulnerable to adverse change.

3. Has been recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandates of FLPMA.

4. Has qualities that warrant highlighting in order to satisfy public or management concerns about safety and public welfare.

5. Poses a significant threat to human life and safety or to property.

The information which follows is organized in alphabetical order by name of the nominated area. Volume III of the Draft Coeur d'Alene RMP/EIS contains detailed maps of the areas.

Constitution Mine and Millsite (See Map #47 in Volume III of the Draft Coeur d'Alene RMP/EIS)

Description of Area: The Constitution Mine and Millsite are partially located on public land managed by BLM in the upper East Fork of Pine Creek, about nine miles southeast of Pinehurst, in Shoshone County Idaho. The portion on public land managed by BLM includes the gated upper mine portal, the upper mill foundations, the upper part of the mine tailings piles associated with the upper mill, and a passive bioreactor mine water treatment system. BLM has undertaken staged removal actions on the mine, mill area, and upper tailings piles to reduce site hazards.

Relevance Criteria: This nomination meets the relevance criteria for a natural hazard. As part of the planned remedial actions at the site, mine tailings containing heavy metals will remain and be capped onsite.

These metals are susceptible to leaching through natural processes into the surrounding environment. The bioreactor will continue to operate, removing and storing heavy metals within the treatment system onsite. The mine and mill concrete foundations and walls, which have been left to reflect local mining history, could present physical hazards for the public.

Importance Criteria: This nomination meets the importance criteria for safety and public welfare, and threat to human life and safety or property. The principal threat is the mine tailings because heavy metal concentrations are well above background levels and long term exposure guidelines for humans and wildlife. The metals are also susceptible to leaching through natural processes into the surrounding environment. The bioreactor is also of significant concern because it is an open, anaerobic bacteria treatment system which could be a long-term safety risk for the public if access is not restricted. The physical hazards of the remaining mill foundations and walls, and the gated mine portal pose additional threats to public safety.

Findings: This nomination meets the relevance and importance criteria for a natural hazard, safety and public welfare, and threat to human life and safety or property, and will be carried forward for consideration as a potential ACEC in the Coeur d'Alene Resource Management Plan.

Farnham Forest (See Map #48 in Volume III of the Draft Coeur d'Alene RMP/EIS)

Description of Area: This area is located approximately 12 air miles northwest of Bonners Ferry, in Boundary County Idaho, along the eastern margin of the Selkirk Mountains. Farnham Forest is composed of a mixture of tree species, ranging from ponderosa pine to western red cedar and western hemlock. The oldest trees at this site are approaching or exceed 300 years old.

Relevance Criteria: This nomination meets the relevance criteria for a fish and wildlife resource, and a natural process or system. Farnham Forest is within the designated recovery zone for grizzly bears (threatened). This area has been identified by Partners-In-Flight as an Important Birding Area (IBA) at the local level. Partners-In-Flight is a coalition of agency and private organizations interested in migratory birds, which identifies IBAs at the local, state, national, and global scale. Acres covered by old forest communities have declined significantly in northern Idaho compared with historic conditions (Quigley et al. 1997).

Importance Criteria: This nomination meets the importance criteria for more than local significance and for qualities or circumstances which make it rare, irreplaceable, and vulnerable to adverse change. The area provides habitat for a federally listed species, and the old forest community at Farnham Forest is irreplaceable and vulnerable to adverse change.

Findings: This nomination meets the relevance and importance criteria for a fish and wildlife resource, a natural process or system, and provides habitat for a federally listed threatened species. Therefore, it will be carried forward for consideration as a potential RNA/ACEC in the Coeur d'Alene Resource Management Plan. RNA designation is recommended because the old forest community is a typical representation of a common plant or animal association in an ecological stage which has significantly declined in northern Idaho, and would provide educational and research opportunities.

Gamlin Lake (See Map #49 in Volume III of the Draft Coeur d'Alene RMP/EIS)

Description of Area: This lake lies approximately 8 air miles southeast of Sandpoint and one air mile west of Lake Pend Oreille in Bonner County Idaho. The area nominated for ACEC designation includes approximately 59 of the 418 acres that BLM manages surrounding Gamlin Lake. Within this area, upland forest, meadow, riparian, and wetland plant communities are present. Technically speaking, these wetlands

may be more accurately labeled peatlands, which have waterlogged substrates and at least 12 inches of peat accumulation.

Relevance Criteria: This nomination meets the relevance criteria for a fish and wildlife resource, and a natural process or system. The site provides habitat for migratory birds. This area has been identified by Partners-In-Flight as an Important Birding Area (IBA) at the local level. Partners-In-Flight is a coalition of agency and private organizations interested in migratory birds, which identifies IBAs at the local, state, national, and global scale. Five BLM sensitive plant species occur in the peatland and riparian communities (bristly sedge, bulb-bearing water hemlock, large Canadian St. John's-wort, Mingan moonwort, and water clubrush).

Importance Criteria: The area meets the importance criteria for more than local significance, and qualities that make it sensitive or rare. The area provides habitat for BLM sensitive species and other natural processes. In Idaho, low and mid-elevation peatlands of the type that occur at Gamlin Lake, have been recognized as important habitats characterized by a unique suite of environmental conditions and hosting more than 40 rare plant and animal species (Bursik and Moseley 1995). Compared to the largely unbroken stretches of peatlands located more than 600 miles to the north, Idaho peatlands, particularly low elevation valley peatlands, are rare.

Findings: This nomination meets the relevance and importance criteria for a fish and wildlife resource, a natural process or system, and provides habitat for BLM sensitive species. Therefore, it will be carried forward for consideration as a potential ACEC in the Coeur d'Alene Resource Management Plan.

Hecla-Star Tailings Piles (See Map #50 in Volume III of the Draft Coeur d'Alene RMP/EIS)

Description of Area: The Hecla-Star mine tailings piles are partially located on public land managed by BLM along lower Canyon Creek, approximately two miles northeast of Wallace, in Shoshone County Idaho. Two tailings piles and half of a third pile are on public land managed by BLM, covering about a half mile of floodplain, or 22 acres. The tailings piles on public land managed by BLM are part of a complex of six tailings piles covering about one mile of the lower Canyon Creek floodplain.

Relevance Criteria: This nomination meets the relevance criteria for a natural hazard. As part of the planned remedial actions at the site, mine tailings containing heavy metals will likely remain onsite. The tailings are over twenty feet deep and are covered with leveled soil or rock caps. The heavy metals are susceptible to leaching through natural processes into the surrounding environment. Presently, a pilot water treatment plant is located on the top of the most upstream pile. Water discharging from the Gem Mine upstream is piped to the treatment plant, where part of the flow is treated and then released along with the remaining untreated water into Canyon Creek.

Importance Criteria: This nomination meets the importance criteria for safety and public welfare, and threat to human health and safety or property. The principal threat is the mine tailings because heavy metal concentrations are above background levels and long term exposure guidelines for humans and wildlife. The tailings are presently capped, but the metals are still susceptible to leaching through natural processes into the surrounding environment. There is also a threat of potential erosion from extreme flood events, since Canyon Creek flows along the south side of the piles.

Findings: This nomination meets the relevance and importance criteria for a natural hazard, safety and public welfare, and threat to human life and safety or property. Therefore, it will be carried forward for consideration as a potential ACEC in the Coeur d'Alene Resource Management Plan.

Hideaway Islands (See Map #51 in Volume III of the Draft Coeur d'Alene RMP/EIS)

Description of Area: This is an existing RNA/ACEC consisting of two islands along the Kootenai River, located approximately five air miles east of Bonners Ferry, in Boundary County Idaho. The Hideaway Islands were designated as an RNA/ACEC in 1985 to preserve riparian plant communities in an unmodified condition for the primary purpose of research and education. The RNA/ACEC was listed as 170 acres in size when it was designated. However, recent, more accurate Geographic Information System (GIS) calculations determined the size of the RNA/ACEC to be 76 acres. Hideaway Islands are managed by BLM in a non-destructive and non-manipulative manner.

Relevance Criteria: This nomination meets the relevance criteria for a fish and wildlife resource, and a natural process or system. A pair of bald eagles (threatened) established a nest on Hideaway Islands in 1995 and has successfully raised their young there. The islands contain a good example of a black cottonwood/red-osier dogwood riparian plant community in various stages of ecological succession. Three species of cottonwood are found on the islands: Black cottonwood, narrowleaf cottonwood, and eastern cottonwood. Eastern cottonwood is an eastern United States disjunct species that is uncommon in Idaho. The black cottonwood/red-osier dogwood community type is considered very rare in Idaho, with five or fewer occurrences known statewide. A western choke cherry and a Suksdorf hawthorn at this site have been measured as the largest in Idaho.

Importance Criteria: This nomination meets the importance criteria for more than local significance, and qualities or circumstances which make it rare, irreplaceable, and vulnerable to adverse change. The area provides habitat for a federally listed species.

Findings: This nomination meets the relevance and importance criteria for a fish and wildlife resource, a natural process or system, and provides habitat for BLM sensitive species. Therefore, it will be carried forward for consideration as a potential RNA/ACEC in the Coeur d'Alene Resource Management Plan.

Killarney Lake (See Map #52 in Volume III of the Draft Coeur d'Alene RMP/EIS)

Description of Area: This area includes all public land managed by BLM around Killarney Lake and the wetland tract on the southeast side of the lake in the Lower Coeur d'Alene River floodplain. It is about five air miles west of the community of Rose Lake, in Kootenai County Idaho.

Relevance Criteria: This nomination meets the relevance criteria for a fish and wildlife resource, and a natural hazard. Bull trout (threatened) use Lake Coeur d'Alene for adult/subadult rearing and use the Coeur d'Alene River as a migration corridor. One pair of bald eagles (threatened) has been nesting within a mile of these lands. Migratory birds use the area. The lake and floodplain have been contaminated by mine tailings transported down the Coeur d'Alene River system from the upstream historic mining areas. The principal hazard is the heavy metal concentrations in the tailings that are well above background levels and long term exposure guidelines for humans and wildlife. Studies have shown high metals concentrations in this area have killed or injured tundra swans and other waterfowl (Chupp and Dalke 1964).

Importance Criteria: This nomination meets the importance criteria for safety and public welfare, a threat to human health and safety or property, and has sensitive and vulnerable wildlife issues. The tailings and associated water quality issues are a threat to the public, as well as to wildlife. BLM has implemented measures to protect the public from the tailings around the developed recreation sites at Killarney Lake. However, migratory birds are still exposed to heavy metals through contact with sediments. The heavy metals concentrations of tailings in the undeveloped floodplain areas are above background levels and long term exposure guidelines for humans and wildlife.

Findings: This nomination meets the relevance and importance criteria for a fish and wildlife resource, safety and public welfare, and threat to human life and safety or property. Therefore it will be carried forward for consideration as a potential ACEC in the Coeur d'Alene Resource Management Plan.

Kootenai River Front (See Map #53 in Volume III of the Draft Coeur d'Alene RMP/EIS)

Description of Area: This area is in Boundary County, Idaho and includes all public land managed by BLM along the Kootenai River within the canyon, beginning approximately five air miles east of Bonners Ferry at Hideaway Islands, and continuing upstream to the Idaho-Montana state line.

Relevance Criteria: This nomination meets the relevance criteria for a fish and wildlife resource. Kootenai River sturgeon (endangered), bull trout (threatened) and westslope cutthroat trout (BLM sensitive) use the Kootenai River. One pair of bald eagles (threatened) has been nesting within the canyon since 1990, and a second pair of eagles has been nesting there since 1996, with both eagle pairs having successfully reproduced. Annual monitoring of all bald eagle nests from Bonners Ferry upstream to the Idaho-Montana Stateline has documented the pairs of birds moving to new nest trees within their established nesting territory. Therefore, any and all BLM public lands could provide potential nest sites. An average of ten bald eagles has wintered along the Kootenai River from Bonners Ferry to the Idaho-Montana stateline since 1980, when biologists began monitoring mid-winter populations of eagles.

Importance Criteria: This nomination meets the importance criteria for more than local significance, and qualities or circumstances that make it endangered and/or threatened. This area provides habitat for federally listed threatened and endangered species.

Findings: This nomination meets the relevance and importance criteria for a fish and wildlife resource, and a natural process or system, and provides habitat for federally listed threatened and endangered species. Therefore it will be carried forward for consideration as a potential ACEC in the Coeur d'Alene Resource Management Plan.

Liberal King Millsite (See Map #54 in Volume III of the Draft Coeur d'Alene RMP/EIS)

Description of Area: The Liberal King Millsite is located on a hillside overlooking Pine Creek, about three air miles south of Pinehurst, in Shoshone County Idaho. The abandoned mill buildings and southern part of the rock dump are on public land managed by BLM. The mine and the northern part of the rock dump are on private land.

Relevance Criteria: This nomination meets the relevance criteria for cultural value and a natural hazard. It has the only example of a standing mining mill site in federal ownership in the Silver Valley, an area where mining has played a significant part in local history. The main mill building is a highly visible example of historic mining structures. The site meets the criteria for natural hazard because high concentrations of heavy metals remain in the mill area and may be subsequently released by natural processes into the surrounding environment.

Importance Criteria: The nomination meets the importance criteria for more than local significance, and irreplaceable qualities. This nomination also meets the criteria for safety and public welfare, and threat to human health and safety or property. The principal threat is the mill area because heavy metal concentrations are well above background levels and long term exposure guidelines for humans and wildlife. The metals are also susceptible to leaching through natural processes into the surrounding environment. The safety concerns are physical hazards and contaminants associated with the mill buildings and rock dump.

Findings: This nomination meets the relevance and importance criteria for cultural value, a natural hazard, safety and public welfare, and threat to human life and safety or property, and will be carried forward for consideration as a potential ACEC in the Coeur d'Alene Resource Management Plan.

Little North Fork Clearwater Headwaters (See Map #55 in Volume III of the Draft Coeur d'Alene RMP/EIS)

Description of Area: This nomination includes public land managed by BLM associated with the system of streams that join together to form the headwaters of the Little North Fork Clearwater River, and the Marble Creek headwaters vicinity (including Freezeout and Delaney Creeks) located approximately 15 air miles northeast of Clarkia, in Shoshone County Idaho. A portion of the area was proposed as an Outstanding Natural Area (ONA) in 1986 by the North Idaho Proposed MFP Amendment and Final EIS for Wilderness but was never formally designated. It is adjacent to the existing Lund Creek RNA/ACEC.

Relevance Criteria: This nomination meets the relevance criteria for scenic value, and a fish and wildlife resource. The scenery is rated as Class A, meaning it is distinctive within its physiographic setting. Bull trout (threatened) and westslope cutthroat trout (BLM sensitive) use this segment of the Clearwater River for spawning, rearing, and as a migration corridor. The upper portion of Marble Creek itself provides spawning and rearing habitat for westslope cutthroat trout. Bull trout use the portion of Marble Creek downstream of the BLM lands for spawning and rearing. Suitable habitat for the Coeur d'Alene salamander (BLM sensitive) exists within this portion of the Clearwater River system.

Importance Criteria: This nomination meets the relevance criteria for more than local significance, and qualities or circumstances that make it threatened, exemplary, or unique. This area provides habitat for federally listed and BLM sensitive species.

Findings: This nomination meets the relevance and importance criteria for scenic value, a fish and wildlife resource, and provides habitat for BLM sensitive species. The combination of unusual scenic, fisheries, and wildlife resources meets the requirement for an ONA. Therefore it will be carried forward for consideration as a potential ONA/ACEC in the Coeur d'Alene Resource Management Plan.

Lund Creek (See Map #55 in Volume III of the Draft Coeur d'Alene RMP/EIS)

Description of Area: This is an existing RNA/ACEC. It includes 2905 acres of public land, and is located approximately 15 air miles east of Clarkia, in Shoshone County Idaho. It was designated in 1989 to protect unique natural features and ecological diversity. Scientists and educators are encouraged to use the area for study purposes; however, all uses must be non-destructive. No vegetative manipulation (including timber harvest) or vehicle use is permitted.

Relevance Criteria: This nomination meets the relevance criteria for scenic value, a fish and wildlife resource, and a natural process or system. The scenery in the Lund Creek area is rated as Class A, meaning it is distinctive within its physiographic setting. Bull trout (threatened) and westslope cutthroat trout (BLM sensitive) use this stream for spawning and rearing. Suitable habitat for the Coeur d'Alene salamander (BLM sensitive) is present. Old growth mountain hemlock and subalpine fir are found in the drainage. A number of aquatic features such as Little Lost Lake, bogs, marshes, streams, and waterfalls are present. Lund Creek itself and its associated riparian plant community are rated as being in very good ecological condition. Bogs and marshes in the Grandmother Mountain area are considered subalpine peatlands, characterized by a mixture of plant species common to the mountain systems of western North America, as well as plant species more typical of boreal habitats occurring hundreds of miles north of the planning area. Although peatlands

comprise a very small percentage of vegetation across the landscape, they are among the most floristically diverse vegetation types.

Importance Criteria: This nomination meets the importance criteria for more than local significance, and qualities or circumstances which make it rare, irreplaceable, threatened, and vulnerable to adverse change. This area provides habitat for federally listed and BLM sensitive species.

Findings: This nomination meets the relevance and importance criteria for scenic value, a fish and wildlife resource, a natural process or system, and provides habitat for BLM sensitive species. Therefore it will be carried forward for consideration as a potential ACEC in the Coeur d'Alene Resource Management Plan.

Morton Slough (See Map #57 in Volume III of the Draft Coeur d'Alene RMP/EIS)

Description of Area: This nomination consists of three isolated tracts totaling 119 acres in the vicinity of Morton Slough, which is connected to the Pend Oreille River. The tracts are located approximately eight miles southwest of Sandpoint, in Bonner County Idaho.

Relevance Criteria: This nomination meets the relevance criteria for a fish and wildlife resource and a natural process or system. A pair of bald eagles (threatened) first nested on one of the parcels in 1995 and has successfully reproduced there. The 400-acre slough area along the Pend Oreille River has been identified by Partners-In-Flight as an Important Birding Area (IBA) at the state level. This organization also acknowledges the eagle nest on public land managed by BLM. Partners-In-Flight is a coalition of agency and private organizations interested in migratory birds, which identifies IBAs at the local, state, national, and global scale. Old-growth ponderosa pine occurs on the other two parcels. The scientific assessment done for the Interior Columbia Basin found that vegetation has changed significantly from historic conditions, especially the loss of "open" stands of mature and old growth ponderosa pine forests (Quigley et al. 1997, Wisdom et al. 2000). This area provides habitat for BLM sensitive wildlife species that are associated with mature and old growth ponderosa pine stands.

Importance Criteria: This nomination meets the importance criteria for more than local significance, and qualities or circumstances which make it rare, irreplaceable, and vulnerable to adverse change. Researchers report that 60-70% of old-growth ponderosa pine forests in Idaho have been degraded due to fire suppression and selective logging of larger-diameter trees (Noss et al. 1995). The old growth ponderosa pine stands within this nominated area are among the few that have not been degraded. This area also provides habitat for federally listed species, BLM sensitive species, and species linked to old growth ponderosa pine ecosystems.

Findings: This nomination meets the relevance and importance criteria for a fish and wildlife resource, and a natural process or system, and provides habitat for BLM sensitive species. Therefore, it will be carried forward for consideration as a potential ACEC in the Coeur d'Alene Resource Management Plan.

Mother Lode Mine (See Map #56 in Volume III of the Draft Coeur d'Alene RMP/EIS)

Description of Area: The Mother Lode Mine is located partly on public land managed by BLM along Prichard Creek, approximately two miles east of Murray, in Shoshone County Idaho. The gated mine portal, a steep re-graded rock dump, and a passive bioreactor mine water treatment system are on public land managed by BLM.

Relevance Criteria: This nomination meets the relevance criteria for a natural hazard. Although removal actions have occurred at the site, some heavy metals contamination remains in the vicinity of the mine. These heavy metals are susceptible to leaching through natural processes into the surrounding environment. Water

with high heavy metals levels will continue to discharge from the mine. The bioreactor will continue to operate, removing and storing heavy metals within the treatment system onsite.

Importance Criteria: This nomination meets the importance criteria for safety and public welfare, and threat to human health and safety or property. The principal threat is the mine discharge and mine wastes because heavy metal concentrations are well above background levels and long term exposure guidelines for humans and wildlife. The bioreactor is also of significant concern because it is an open, anaerobic bacteria treatment system which could be a long-term safety risk for the public if access is not restricted. Another safety issue is the potential physical hazard from the gated mine portal.

Findings: This nomination meets the relevance and importance criteria for a natural hazard, safety and public welfare, and threat to human life and safety or property. Therefore it will be carried forward for consideration as a potential ACEC in the Coeur d'Alene Resource Management Plan.

Nabob Millsite (See Map #54 in Volume III of the Draft Coeur d'Alene RMP/EIS)

Description of Area: The Nabob Millsite is located partly on public land managed by BLM at the mouth of Nabob Creek in the lower East Fork of Pine Creek, about four air miles south of Pinehurst, in Shoshone County Idaho. The mine tailings pile from the current mill, the old mill foundations, and the current mill buildings are on public land managed by BLM. BLM and the mill operator have undertaken staged removal actions on the tailings pile to reduce site hazards due to high heavy metal concentrations. The mill building is still under a millsite claim, and the operator has been removing equipment and parts of the building structure.

Relevance Criteria: This nomination meets the relevance criteria for a natural hazard. As part of the removal actions and planned remedial actions at the site, mine tailings containing heavy metals will remain and be capped onsite. The metals are susceptible to leaching through natural processes into the surrounding environment. The tailings are over forty feet deep, and Nabob Creek flows along the south side of the tailings embankment.

Importance Criteria: This nomination meets the importance criteria for safety and public welfare, and threat to human health and safety or property. The principal threat is the tailings and mill area because heavy metals concentrations are well above background levels and long term exposure guidelines for humans and wildlife. The safety concerns are the physical hazards and contaminants around the mill buildings, and the stability of the tailings pile and potential erosion from creek flooding.

Findings: This nomination meets the relevance and importance criteria for a natural hazard, safety and public welfare, and threat to human life and safety or property, and will be carried forward for consideration as a potential ACEC in the Coeur d'Alene Resource Management Plan.

Pulaski Tunnel Historic Site (See Map #58 in Volume III of the Draft Coeur d'Alene RMP/EIS)

Description of Area: The Pulaski Tunnel is located about one mile southwest of Wallace, in Shoshone County Idaho. The area is in a steep-sided creek bottom and includes a mine adit (referred to as a tunnel) and trail.

Relevance Criteria: The Pulaski Tunnel area meets the relevance criteria since it is a significant cultural resource site associated with saving the lives of firefighters in the 1910 fires. The site, which is a mine adit originally used for mining and then later used by Pulaski to save his crew from being overtaken by a raging fire, is currently listed on the National Register of Historic Places.

Importance Criteria: The site meets the importance criteria since it represents a significant event in our history and is recognized as having national significance. This area could be threatened by future mining activity.

Findings: This site meets the relevance and importance criteria for historic and cultural values and will be carried forward for consideration as a potential ACEC in the Coeur d'Alene Resource Management Plan.

Rex Millsite Mine Tailings Pile (See Map #59 in Volume III of the Draft Coeur d'Alene RMP/EIS)

Description of Area: The Rex Millsite Mine Tailings Pile is located partially on public land managed by BLM, in a draw above the East Fork of Nine Mile Creek, approximately six air miles northeast of Wallace, in Shoshone County Idaho. Over half of the tailings pile and a dam between the draw and the tailings pile are located on public land. The Rex Mine, rock dump and mill, and the rest of the tailings pile are on private land, and are therefore not part of the nominated area.

Relevance Criteria: This nomination meets the relevance criteria for a natural hazard. As part of the planned remedial actions at the site, mine tailings containing heavy metals will likely remain onsite. The tailings are presently exposed (not capped), with the metals susceptible to leaching through natural processes into the surrounding environment. The tailings are over sixty feet deep, and the dam face measures over 110 feet high down to the draw. The creek has been diverted to flow along the southeast edge of the dam.

Importance Criteria: This nomination meets the importance criteria for safety and public welfare, and threat to human health and safety or property. The principal threat is the tailings because heavy metal concentrations are well above background levels and long term exposure guidelines for humans and wildlife. The safety concerns are physical hazards, the stability of the tailings pile and dam, and potential erosion of the tailings due to flooding.

Findings: This nomination meets the relevance and importance criteria for a natural hazard, safety and public welfare, and threat to human life and safety or property, and will be carried forward for consideration as a potential ACEC in the Coeur d'Alene Resource Management Plan.

Rochat Divide (See Map #60 in Volume III of the Draft Coeur d'Alene RMP/EIS)

Description of the Area: This area is located in Benewah, Kootenai, and Shoshone Counties of Idaho, on the major watershed divide between the St. Joe River and Coeur d'Alene River. The south end is near St. Joe Baldy peak and the area trends north to Latour Baldy peak. Latour Baldy lies approximately 6 miles southwest of Pinehurst, Idaho. A portion of the area was proposed as an ONA in 1986 by the North Idaho Proposed MFP Amendment and Final EIS for Wilderness but was never formally designated. The area has virtually unlimited vistas and opportunity for solitude. It is important for past and current Native American spiritual use, scenic qualities, and important wildlife habitat.

Relevance Criteria: This nomination meets the relevance criteria for cultural, scenic, and wildlife resources. The divide between the two major river drainages serves as a significant spiritual area for the Coeur d'Alene Tribe. The area offers outstanding views of the region and possesses Class A scenery, meaning it is distinctive within its physiographic setting. The area provides habitat for the wolverine (BLM sensitive). Female wolverines den underneath boulders and snow within the area's cirque basins.

Importance Criteria: This nomination meets the importance criteria for qualities or circumstances which make it rare, irreplaceable, and vulnerable to adverse change. Scenic values are rated high for this area, and the viewshed is very vulnerable to adverse change. Research in the Sawtooth Mountains of central Idaho

demonstrated that human disturbance near wolverine den sites will cause the female to abandon her den and her young inside (Copeland 1996). This area also meets the importance criteria for cultural because of its spiritual values for the Coeur d'Alene Tribe.

Findings: This nomination meets the relevance and importance criteria for cultural, scenic, and wildlife. The combination of unusual cultural, scenic, and wildlife resources meets the requirement for an ONA. Therefore it will be carried forward for consideration as a potential ONA/ACEC in the Coeur d'Alene Resource Management Plan

Sidney Mine and Millsite (See Map #61 in Volume III of the Draft Coeur d'Alene RMP/EIS)

Description of Area: The Sidney Mine and Millsite are located largely on public land managed by BLM in upper Red Cloud Creek, a tributary to Highland Creek in the East Fork of Pine Creek drainage, approximately 4 air miles southeast of Pinehurst, in Shoshone County Idaho. The gated mine portal, the main mill foundations, the steep-sloped upper rock dump, and a passive bioreactor mine water treatment system are on public land. To reduce the site hazards BLM has undertaken staged removal actions at the mine, mill area, stream diversion, and upper rock dump.

Relevance Criteria: This nomination meets the relevance criteria for a natural hazard. Even after removal actions at the site, some mine- and rock dump-area heavy metals contamination will remain. These metals are susceptible to leaching through natural processes into the surrounding environment. Water with high metals levels will continue to discharge from the mine. The bioreactor will continue to operate, removing and storing metals within the system onsite.

Importance Criteria: This nomination meets the importance criteria for safety and public welfare and threat to human health and safety or property. The principal threat is the mine discharge and mill wastes because heavy metals concentrations are well above background levels and long term exposure guidelines for humans and wildlife. The bioreactor is also of significant concern because it is an open, anaerobic bacteria treatment system which could be a long-term safety risk for the public if access is not restricted. The physical hazards of the remaining mill foundations and walls, the steep rock dump, and the gated mine portal pose additional threats to public safety.

Findings: This nomination meets the relevance and importance criteria for a natural hazard, safety and public welfare, and threat to human life and safety or property, and will be carried forward for consideration as a potential ACEC in the Coeur d'Alene Resource Management Plan.

Wallace Landfill (See Map #50 in Volume III of the Draft Coeur d'Alene RMP/EIS)

Description of Area: A portion of the southeast corner of the Wallace Landfill is located on public land managed by BLM in Lower Canyon Creek, approximately 1 air mile northeast of Wallace, in Shoshone County Idaho.

Relevance Criteria: This nomination meets the relevance criteria for a natural hazard. The landfill has buried deleterious materials. Seepage of potentially contaminated ground water and precipitation run-off from the site has been observed near the creek. Potentially hazardous materials located at the site are susceptible to erosion or leaching through natural processes into the surrounding environment.

Importance Criteria: This nomination meets the importance criteria for safety and public welfare, and threat to human health and safety or property. The main safety concern is the buried deleterious materials. The principal threat comes from leached substances and buried materials.

Findings: This nomination meets the relevance and importance criteria for a natural hazard, safety and public welfare, and threat to human life and safety or property, and will be carried forward for consideration as a potential ACEC in the Coeur d'Alene Resource Management Plan.

We-Like Mine (See Map #62 in Volume III of the Draft Coeur d'Alene RMP/EIS)

Description of Area: The We-Like Mine is located largely on public land managed by BLM in Grouse Creek approximately two air miles northwest of Mullan, in Shoshone County Idaho. The site includes the gated mine portal, a steep-sloped rock dump, and a pilot passive bioreactor mine water treatment system.

Relevance Criteria: This nomination meets the relevance criteria for a natural hazard. With the planned remediation at the site, some mine-area heavy metals contamination will remain. These metals are susceptible to leaching through natural processes into the surrounding environment. Water with high metals level will continue to discharge from the mine. The bioreactor will continue to operate, removing and storing metals within the system onsite.

Importance Criteria: This nomination meets the importance criteria for safety and public welfare, and threat to human health and safety or property. The principal threat is the mine discharge and mine wastes because heavy metals concentrations are well above background levels and long term exposure guidelines for humans and wildlife. The metals also are susceptible to leaching through natural processes into the surrounding environment. The bioreactor is also a concern because it is an anaerobic bacteria treatment tank system which could be a long-term safety risk for the public if access is not restricted. There are also physical hazards onsite, including the gated mine portal and steep rock dump, which pose additional threats to public safety.

Findings: This nomination meets the relevance and importance criteria for a natural hazard, safety and public welfare, and threat to human life and safety or property, and will be carried forward for consideration as a potential ACEC in the Coeur d'Alene Resource Management Plan.

Windy Bay (See Map #63 in Volume III of the Draft Coeur d'Alene RMP/EIS)

Description of Area: This area is located approximately 4 air miles north of Worley, in Kootenai County Idaho, along the south side of Windy Bay on Lake Coeur d'Alene. A small remnant (16 acres) of rough fescue grassland grows along the edge of the bluff above the bay, situated between gently-rolling agricultural fields and the steep, forested hillsides that descend down to the bay.

Relevance Criteria: This nomination meets the relevance criteria for a natural process or system. Rough fescue grassland is very rare in Idaho, known from less than five scattered sites along the eastern margin of the Palouse Prairie.

Importance Criteria: This nomination meets the importance criteria for more than local significance, and qualities or circumstances which make it rare, irreplaceable, and vulnerable to adverse change. Nearly 100% of the area historically occupied by the Palouse Prairie in eastern Washington and adjacent Idaho has been converted to agricultural use. Remnants of Palouse Prairie vegetation, which includes rough fescue grassland along the eastern boundary, are now restricted to edges of cultivated fields or rocky slopes along the margins of the former Prairie (Lichthardt and Moseley 1997). The Palouse Prairie is considered one of the most endangered ecosystems in the United States (Noss 1995, Noss et al. 1995).

Findings: This nomination meets the relevance and importance criteria for a natural process or system and will be carried forward for consideration as a potential ACEC in the Coeur d'Alene Resource Management Plan.

Wolf Lodge Bay (See Map #64 in Volume III of the Draft Coeur d'Alene RMP/EIS)

Description of Area: This area includes all the public land managed by BLM surrounding Wolf Lodge, Beauty, and Blue Creek Bays of Lake Coeur d'Alene. These bays are located approximately 5 air miles southeast of Coeur d'Alene, in Kootenai County Idaho.

Relevance Criteria: This nomination meets the relevance criteria for a fish and wildlife resource. Bull trout (threatened) and westslope cutthroat trout (BLM sensitive) use portions of the lake for adult/subadult rearing. Blue Creek also provides spawning and rearing habitat for westslope cutthroat trout. Migratory bald eagles (threatened) use the area for foraging and over-wintering habitat. The first Coeur d'Alene salamander (BLM sensitive) known to science was observed along the water's edge of Wolf Lodge Bay. Other BLM sensitive and migratory birds use the area. Partners-In-Flight, which is a coalition of agency and private organizations interested in migratory birds, have identified Important Birding Areas (IBA) at the local, state, national, and global scale. This area is an IBA at the state level.

Importance Criteria: This nomination meets the importance criteria for more than locally significant, and qualities or circumstances which make it threatened or endangered. This area provides habitat for federally listed and BLM sensitive species.

Findings: This nomination meets the relevance and importance criteria for fish and wildlife resource, provides habitat for BLM sensitive species, and will be carried forward for consideration as a potential ACEC in the Coeur d'Alene Resource Management Plan.

SUMMARY AND CONCLUSIONS

BLM found that all 21 areas nominated for ACEC status met the relevance and importance criteria. These areas are now referred to as "Potential ACECs" and will be considered and further analyzed in the alternatives for the RMP. Table G-2 contains a summary of these potential areas.

Table G-2: Potential Areas of Critical Environmental Concern

Area Name	Values	Acres
Constitution Mine & Millsite	Mine tailings hazard, bioreactor safety concern, cultural	6
Farnham Forest	Grizzly bear, old growth forest	29
Gamlin Lake	Wetland and riparian areas, Idaho BLM sensitive plant species, migratory birds	59
Hecla-Star Tailings Piles	Mine tailings hazard	22
Hideaway Islands	Designated RNA/ACEC, bald eagles, rare riparian plant community	76
Killarney Lake	Bull trout, bald eagles, migratory birds, mine tailings hazard	69
Kootenai River Front	Kootenai River sturgeon, bull trout, westslope cutthroat trout, bald eagles	533
Liberal King Millsite	Historic/cultural, heavy metals hazard, mill buildings and rock dump safety concerns	2

Table G-2: Potential Areas of Critical Environmental Concern

Area Name	Values	Acres
Little North Fork Clearwater River	Scenic, bull trout, westslope cutthroat trout, habitat for Coeur d'Alene salamander	9592
Lund Creek	Designated RNA/ACEC, bull trout, westslope cutthroat trout, habitat for Coeur d'Alene salamander, old growth mountain hemlock and subalpine fir, Little Lost Lake, wetland and riparian communities	2905
Morton Slough	Bald eagles, old growth ponderosa pine, habitat for BLM Sensitive wildlife	119
Mother Lode Mine	Heavy metals hazard, bioreactor safety concern	0.80
Nabob Millsite	Mine tailings hazard, mill buildings safety concern	8
Pulaski Tunnel Historic Site	Historic, cultural	58
Rex Millsite Tailings Pile	Mine tailings hazard, dam stability issue	6
Rochat Divide	Cultural, scenic, wolverine	11,653
Sidney Mine & Millsite	Heavy metals hazard, rock dump, bioreactor safety concern	6
Wallace Landfill	Deleterious materials hazard, contaminated seepage and run-off	0.3
We-Like Mine	Heavy metals hazard, rock dump, bioreactor safety concern	0.3
Windy Bay	Rare grassland plant community	16
Wolf Lodge Bay	Bull trout, westslope cutthroat trout, bald eagles, Coeur d'Alene salamander, migratory birds	1094

APPENDIX H – MINERALS REASONABLY FORESEEABLE DEVELOPMENT

Appendix H: Reasonably Foreseeable Development Scenarios for Minerals

Introduction

This appendix describes the Reasonably Foreseeable Development (RFD) scenarios for leasable, locatable, and salable mineral commodities. The purpose of this information is to provide a model that predicts the level and type of future mineral activity in the planning area, and will serve as a basis for cumulative impact analysis as called for in the Supplemental Program Guidance for Energy and Mineral Resources (BLM Manual Section 1624). The RFD first describes the steps involved in developing a mineral deposit, with presentation of hypothetical exploration and production operations. The current activity levels are discussed in Chapter 2 of this document. Future trends and assumptions affecting mineral activity are discussed here, followed by the prediction and identification of anticipated mineral exploration and development.

Scope

The development scenarios are limited in scope to BLM managed lands within the planning area. The RFD is based on the known, or inferred mineral resource capabilities of the lands involved, and applies the conditions and assumptions discussed under Future Trends and Assumptions. Changes in available geologic data and/or economic conditions would alter the RFD, and some deviation is to be expected over time.

Leasable Mineral Resources

Oil and Gas:

Future Trends and Assumptions

Based on the history of past drilling and foreseeable development potential in the Coeur d'Alene Field Office, activity over the next 15 to 20 years would continue to be low. It is anticipated that oil and gas activity could consist of the issuance of 1 or 2 geophysical surveys and perhaps the drilling of 1 or 2 exploratory holes. However, it is noted that this level of activity is highly speculative due to the fact only two exploratory oil/gas wells have ever been recorded in the planning area. These two wells were drilled in 1928-1929 and did not encounter any hydrocarbons. Also, because there is limited information concerning possible occurrence of hydrocarbons in the planning area, any activity associated with oil and gas could occur anywhere in the planning area.

Because of the low potential for development of hydrocarbons we do not anticipate the discovery of a producible oil and gas field during the period covered by this plan; however, the potential surface impacts associated with the discovery and development of a small oil/gas field are given in the following sections.

The development and reclamation of oil and gas sites would be subject to 43 CFR 3100.

Geophysical Exploration

Geophysical exploration is conducted to determine the subsurface structure of an area. Three geophysical survey techniques are generally used to define subsurface characteristics through measurements of the gravitational field, magnetic field, and seismic reflections.

Gravity and Magnetic field surveys: These two techniques involve small portable measuring units which are easily transported via light off-road vehicles, such as four-wheel drive pickups and jeeps, or aircraft. Both off-road and on-road travel may be necessary in these two types of surveys. Usually a three-man crew

transported by one or two vehicles is required. Sometimes small holes (approximately 1 inch by 2 inches by 2 inches) are hand dug for instrument placement at the survey measurement points. These two survey methods can make measurements along defined lines, but it is more common to have a grid of discrete measurement stations.

Seismic Reflection surveys: This technique is the most common of the geophysical methods and produces the most detailed subsurface information. Seismic surveys are conducted by sending shock waves through the Earth's surface. The waves are generated by a small explosion or through mechanically beating the ground surface with a thumping or vibrating platform. The thumper and vibrator methods pound or vibrate the ground surface using four large trucks (typically), each equipped with pads about 4-foot square. The pads are lowered to the ground, and the vibrators are electronically triggered from the recording truck. Once information is recorded, the trucks are moved forward a short distance and the process is repeated. Less than 50 square feet of surface area is required to operate the equipment at each recording site.

The small explosive method requires charges to be detonated on the surface or in a drill hole. In the drill hole method, holes for the charges are drilled utilizing truck-mounted or portable air drills to drill small-diameter (2 to 6 inch) holes to depths of 100 to 200 feet. Generally 4 to 12 holes are drilled per mile of line and a 5 to 50 pound charge of explosives is placed in the hole, covered, and detonated. The shock wave created by the detonation is recorded by geophones placed in a linear fashion on the surface. In rugged terrain, a portable drill carried by helicopter can sometimes be used. A typical drilling seismic operation may utilize 10 to 15 men operating 5 to 7 trucks. Under normal conditions, 3 to 5 miles of line can be surveyed daily using this method. The vehicles used for a drilling program may include heavy truck-mounted drill rigs, track-mounted air rigs, water trucks, a computer recording truck, and several light pickups for the surveyors, shot hole crew, geophone crew, permit man, and party chief.

The surface charge method utilizes 1 to 5 pound charges attached to wooden laths 3 to 8 feet above the ground. Placing the charges lower than 6 feet usually results in the destruction of vegetation, while placing the charges higher, or on the surface of deep snow, results in little visible surface disturbance.

Public and private roads and trails are used where possible. However, off-road cross-country travel is also necessary in some cases. Graders and dozers may be required to provide access to remote areas. Several trips a day are made along a seismograph line, usually resulting in a well defined two-track trail. Drilling water, when needed, is usually obtained from private landowners.

During the life of this plan, it is anticipated that 1 or 2 notices of intent involving seismic reflection and gravity/magnetic field surveys could be filed.

Drilling Phase

An operator would determine if they wished to pursue an oil and gas lease based on information collected during geophysical exploration. If a lease is issued, then the lessee would be required to submit an application for a permit to drill (APD). Once the APD is approved, the operator may begin construction activities in accordance with any stipulations and conditions. When a site is chosen that necessitates the construction of an access road, the length of road may vary, but usually the shortest feasible route is selected to reduce the haul distance and construction costs. Environmental factors or a landowner's wishes may dictate a longer route in some cases. Drilling activity in the planning area is predicted to be done using existing roads and constructing short (approximately 0.25 mile) roads to access drill site locations.

During the first phase of drilling, the operator would move construction equipment over existing maintained roads to the point where the access road begins. No more than 0.25 mile of moderate duty access road with a cinder or gravel surface 18 to 20 feet wide is anticipated to be constructed. The total surface disturbance width would average 40 feet with ditches, cuts, and fill. The second part of the drilling phase is the

construction of the drilling pad or platform. The likely duration of well development, testing, and abandonment is predicted to be less than 12 months per drill site. The total disturbance for each exploratory well and any new road constructed to that drill site is expected to be no more than 6 acres.

Based on past oil and gas drilling in North Idaho, it is projected that 1 or 2 exploratory "wildcat" well(s) could be drilled on BLM-administered land in the planning area. The estimated success rate of finding hydrocarbons is predicted to be less than 10 percent, based on the average U.S. wildcat well success rate and the lack of any indications of hydrocarbons in the planning area. The potential for oil and gas occurrence is low throughout BLM lands therefore target areas are unknown. The total surface disturbance caused by exploratory drilling over the life of the plan is expected to be no more than 15 acres.

Field Development and Production

No field development is expected to occur during the life of the plan. However, the following scenario describes operations and impacts associated with field development and production.

Small deposits of oil or gas discovered in the planning area would not be economic to develop. The minimum size that would be economic would be a field containing reserves of 50 to 60 billion cubic feet of gas over a productive lifespan of 10 years. The total area of such a field would be 200 acres with a likely well spacing of 160 acres. The field would require four development wells in addition to the discovery well. Each development well would require 0.25 mile of road, likely cinder or gravel surfaced, and would have a width of about 20 feet. The width of the surface disturbance associated with roads would average 40 feet. Produced gas would be carried by pipelines estimated to average 30 to 60 miles in length, not all of which would necessarily be on BLM lands. The width of surface disturbance for pipelines would average 30 feet. Any produced oil would likely be trucked to transmission lines in Washington for delivery to the west coast. Well servicing requirements would be provided by established service companies.

The total anticipated surface disturbance would be; 8 acres for well pads, 5 acres for roads, 13 acres for field development, and 600 acres for pipelines. In the unlikely event that an economic field is discovered, the total surface disturbance caused by exploration and development over the life of the plan is expected to be between 620 to 630 acres.

Plugging and Abandonment

Wells that are completed as dry holes are plugged according to a plan designed specifically for the downhole conditions of each well. Plugging is accomplished by the placing of cement plugs at strategic locations downhole and up to the surface. Drilling mud is used as a spacer between plugs to prevent communication between fluid bearing zones. The casing is cut off at least 3 feet below ground level and capped by welding a steel plate on the casing stub. After plugging, all equipment and debris would be removed and the site would be restored as near as reasonably possible to its original condition.

It is predicted that the 1 or 2 exploratory wells drilled would be plugged and abandoned.

Geothermal Resources:

Future Trends and Assumptions

With environmental protection and enhancement being a major consideration, clean, low-impacting energy sources are becoming more important. Although abundant geothermal resources are thought to be present in the Northwest (Washington, Oregon, Idaho, and western Montana), none have been identified in the planning area. As the demand for environmentally-friendly energy sources increases, the planning area could attract renewed interest.

The development and reclamation of geothermal sites would be subject to the regulations found in 43 CFR 3200.

Geophysical/Geochemical Exploration

In addition to the geophysical methods discussed in the Oil and Gas section, the following exploration techniques are often employed in geothermal prospecting:

Microseismic: Small seismometers are buried at a shallow depth (hand-dug holes) and transmit signals from naturally-occurring, extremely minor seismic activity (micro-earthquakes) to an amplifier on the surface. Stations are located away from roads to avoid traffic "noise." These units are often backpacked into areas inaccessible to vehicles.

Resistivity: Induced polarization techniques are used to measure the resistance of subsurface rocks to the passage of an electric current. A vehicle-mounted transmitter sends pulses of electrical current into the ground through two widely-spaced electrodes (usually about 2 miles apart). The behavior of these electrical pulses as they travel through underlying rocks is recorded by "pots" (potential electrodes), small ceramic devices that receive the current at different locations. The electrodes are either short (2 to 3 feet) rods driven into the ground, or aluminum foil shallowly buried over an area of several square feet. Two or three small trucks transport the crew of 3 to 5 people to transmitting and receiving sites.

Telluric: A string of "pots" record the variations in the natural electrical currents in the earth. No transmitter is required. Small trucks are used to transport the crew and equipment.

Radiometric: Radioactive emissions (generally radon gas) associated with geothermal resources are usually measured using a hand-held scintillometer, often at hot spring locations. Another method used involves placing plastic cups containing small detector strips sensitive to alpha radiation either on the surface or in shallow hand-dug holes. If holes are dug, they are covered, and the cups left in place for 3 to 4 weeks. At the end of the sampling period, the cups are retrieved and all holes are backfilled. These surveys can be conducted on foot or with the aid of light vehicles.

Geochemical Surveys: Geochemical surveys are usually conducted at hot springs by taking water samples directly from the spring. Sampling for mercury associated with geothermal resources is often done by taking soil samples using hand tools. These surveys can be conducted on foot or with the aid of light vehicles.

Temperature Gradient Drill Hole Surveys: Temperature gradient holes are used to determine the rate of change of temperature with respect to depth. Temperature gradient holes usually vary in diameter from about 3.5 to 4.5 inches, and from a few hundred feet to about 5,000 feet in depth. They are drilled using rotary or coring methods. Approximately 0.1 to 0.25 acre per drill hole would be disturbed. A typical drill site could contain the drill rig, most likely truck-mounted, water tank(s), fuel tank, supply trailer, and a small trailer for the workers. Drilling mud and fluids would be contained in earthen pits or steel tanks. Water for drilling would be hauled in water trucks, or if suitable water sources are close, could be piped directly to the site. Water consumption could range from about 2,000 to 6,000 gallons per day, with as much as 20,000 gallons per day under extreme lost circulation conditions.

Other equipment that would be utilized includes large flatbed trucks to haul drill rod, casing, and other drilling supplies, and in some cases, special cementing and bulk cement trucks. Two or three small vehicles would be used for transporting workers. In most cases, existing roads would be used. It is estimated that short spur trails (usually less than a few hundred yards long) would be bladed for less than 10 percent of these holes. All holes would be plugged and abandoned to protect both surface and subsurface resources,

including aquifers, and reclamation of disturbed areas would be required, unless some benefit to the public could be gained; for example, a water well or camping area.

Depending upon the location and proposed depth of the drill hole, detailed plans of operation that cover drilling methods, casing and cementing programs, well control, and plugging and abandonment may be required.

Based upon past geothermal exploration in the planning area and the lack of an identified geothermal resource, it is anticipated that during the life of this plan less than 5 notices of intent to conduct geothermal exploration would be filed.

Drilling and Testing

Drilling to determine the presence of, test, develop, produce, or inject geothermal resources can be done only on land covered by a geothermal resources lease. A typical geothermal well drilling operation would require 2 to 4 acres for a well pad, including reserve pit, and 0.5 mile of moderate duty access road with a surface 18 to 20 feet wide, totaling up to 40 feet wide with ditches, cuts, and fills. Existing roads would be used whenever possible. Total surface disturbance for each well, and any new road is expected to be no more than 6 acres. In some cases, more than one production well could be drilled from one pad. Well spacing would be determined by the authorized officer after considering topography, reservoir characteristics, optimum number of wells for proposed use, protection of correlative rights, potential for well interference, interference with multiple use of lands, and protection of the surface and subsurface environment. Close coordination with the State would take place. It is anticipated that the duration of well development, testing, and if dry, abandonment, would be 4 months.

Plugging and Abandonment

Prior to abandonment, the operator would be required to plug the hole to prevent contamination of aquifers and any impacts to subsurface and surface resources. Plugging is accomplished by the placing of cement plugs at strategic locations downhole and up to the surface. Depending upon the formations encountered, drilling mud could be used as a spacer between plugs to prevent communication between fluid bearing zones. The casing is cut off at least 3 feet below ground level and capped by welding a steel plate on the casing stub. After plugging, all equipment and debris would be removed, and the site would be restored as near as reasonably possible to its original condition. A dry hole marker is often placed at the surface to identify the well location. If the surface owner prefers, the marker may be buried. Any new roads not needed for other purposes would be reclaimed.

It is estimated that 1 or 2 exploratory wells would be plugged and abandoned during the life of this plan.

Geothermal Power Plant Development

It is projected that no geothermal power plants would be constructed during the life of this plan. However, the following scenario describes operations and impacts associated with development of a geothermal power plant. Before geothermal development could occur, site-specific baseline studies and environmental analyses, with public involvement, would be done. The scenario below describes the level of disturbance that would likely occur from the development of a 24 megawatt power plant.

Five to seven production wells and one or two injection wells would be drilled. It is anticipated that access would be provided by existing roads, and the construction of short (0.5 to 1-mile long) roads with a surface of 18 to 20 feet wide, totaling up to 40 feet wide with ditches, cuts, and fills. Surface disturbance from well pad and road construction would probably range from 2 to 6 acres per well. The power plant facility, including separators, energy converters, turbines, generators, condensers, cooling towers, and switchyard,

would involve an estimated 5 to 10 acres. Pipelines and powerlines would disturb an additional 3 to 6 acres. If a water cooling system is employed, 1 to 3 water wells, requiring about 0.25 acre per well, would be drilled, unless the cooling water was obtained from the geothermal steam condensate. Depending upon location, terrain, geothermal reservoir characteristics, and type of generating facility, total surface disturbance for a 24 megawatt (gross) geothermal power plant, and ancillary structures, would probably range from about 26 to 76 acres, or about 1 to 3 acres per megawatt. After construction, approximately one-third to one-half of the disturbed area would be revegetated. Prior to abandonment, 30 to 50 years later, the remaining disturbed area would be reclaimed.

Direct Use of Geothermal Energy

Low- and moderate-temperature (50 to 300 degrees F) geothermal resources have many direct use applications. Direct applications, and potential development scenarios, include space heating and cooling of residences and businesses, applications in agriculture, aquaculture, and industry, and recreational and therapeutical bathing. Depending upon the type of use and magnitude of operation, surface disturbance could range from a few acres for a well and greenhouses, or food processing facility, to tens of acres for larger agricultural or aquacultural developments.

It is anticipated that no direct use of geothermal energy will occur during the plan period.

Solid Minerals:

Future Trends and Assumptions

The potential for the occurrence of solid leasable minerals (both energy and non-energy) has been rated as low to zero throughout the planning area. Therefore, there is no anticipated future activity related to this resource.

Salable Mineral Resources

Future Trends and Assumptions

The major use of salable minerals (primarily sand, gravel, crushed rock, and decorative stone) would continue to be in support of the State and county highway and road system, BLM roads, and, to a lesser extent, for private purposes. Decorative stone sales to individuals are expected to increase. It is anticipated that the need for rock and sand and gravel will increase for maintenance and construction of county and State roads and highways due to the continued urbanization of northern Idaho.

Existing quarries and pits on private and State lands for obtaining sand, gravel, and rock is currently satisfying the markets, however, new site development on planning area lands is not precluded in this plan. Decorative stone sales could be made anywhere throughout the planning area where not precluded by law or policy.

The development and reclamation of mineral material sites would be subject to the regulations found in 43 CFR 3600.

Rock Quarry, Sand & Gravel Pit Development

Developed material sites typically disturb approximately 15 to 20 acres of land each. This acreage is necessary for the mine itself, rock crushing operations, truck turn-around areas, access trails for bulldozers and drills, overburden stockpile sites, and aggregate stockpile areas. For access to a new quarry site, approximately 0.5 acre of land would be disturbed by new road construction.

Currently there is one approved sand and gravel pit in the planning area, with anticipated production of 300,000 cubic yards and 14.5 acres of surface disturbance. It is expected that this site would be utilized intermittently throughout the planning period, and that 1 to 3 new sites of similar size would be opened up. Any existing pit expansion that causes surface disturbance beyond previously inventoried limits, or the development of any new site, would require resource inventories, site-specific NEPA compliance, and development and reclamation plans.

After all useable material is removed, reclamation work would proceed according to an approved interdisciplinary plan. Upon depletion, reclamation work would be conducted on the material sites as well as on all unneeded access roads and trails. Oversize rock would be put back into the quarries or pits, and, where possible, cut-slopes would be graded to conform with the existing topography. Stockpiled topsoil would be spread over side-slopes and floors, and seeded as directed by BLM. Access roads and trails would be graded for proper drainage, scarified, and seeded.

Decorative Stone

It is anticipated that the Coeur d'Alene office would receive 1 to 3 sale requests per year for decorative stone. In most cases, existing roads would provide access to areas where the stone is scattered on the surface. In these areas, the rock would be hand-picked and loaded directly onto pick-ups or flatbed trucks, or onto pallets and then loaded onto trucks. There could be both on and off-road vehicle travel. This type of activity typically results in negligible surface disturbance. There is a possibility that temporary road or trail construction could be necessary to gain access in some areas. Prior to designating an area as a decorative rock gathering area, and prior to any road or trail construction, appropriate inventories and NEPA compliance would be conducted to prevent unnecessary and undue degradation. Reclamation plans would be developed for any designated collecting areas and their access roads and trails.

Locatable Mineral Resources

Future Trends and Assumptions

The major commodities of interest would continue to be the precious metals gold and silver. This is based on north Idaho's mining history and the favorable geology for mineral occurrences. The other possible commodity of interest could be an uncommon variety of building stone; however, none have been identified in the planning area. Placer gold mining in the Murray area and development of underground lode deposits in the Silver Valley will likely be the main form of locatable mineral resource development. Reclamation science would continue to advance due to experience and research. More detailed design effort would be placed on the reclamation of mined lands in the future. This would result in an overall increase in reclamation costs but those costs would pay dividends in the future with increased reclamation success.

The economics of mining in the planning area would be driven by the relationship between production costs and the market price of the commodity. While production costs can be controlled or anticipated through management and technology, the price of mineral commodities could vary widely from year to year. The overall profitability of an operation, and hence the level of activity at the prospecting, exploration, and mining phases, for development of ore bodies would be closely related to the price of the mineral commodity.

No chemical heap-leaching operations are forecasted during the plan period. If such an operation is proposed during the life of the plan, it would be subjected to environmental review under a plan of operations pursuant to regulations found in 43 CFR 3809.

Casual Use, Notices, Plans of Operations, Use and Occupancy

There are three levels of use defined by the 43 CFR 3809 regulations; casual, notice, and plan of operations. Generally, casual use means activities resulting in negligible, if any, disturbance of public lands or resources. Mechanized earth-moving equipment or truck-mounted drills are not allowed under casual use. Notice-level operations involve surface-disturbing exploration operations of 5 acres or less. Casual use and notice-level operations do not involve Federal actions that require compliance with NEPA. A plan of operations is required for all mining activity that is not casual use, regardless of the number of acres disturbed. A plan is also required for all exploration activities that disturb over 5 acres, bulk sampling which will remove 1,000 tons or more of presumed ore for testing, or for any surface-disturbing operations greater than casual use in certain Special Management Area's and lands/waters that contain federally-proposed or listed threatened or endangered species or their proposed or designated critical habitat. The approval of plans of operations is a Federal action that requires NEPA compliance. Mining claim occupancy associated with notice- or plan-level operations, also requires compliance with NEPA.

Details of plan of operations filing and processing requirements can be found in 43 CFR 3809.400. Generally, plans must include a detailed description of all operations, including a map showing all areas to be disturbed by mining, processing, and access, all equipment that would be used, periods of use, and any necessary buildings or structures. A detailed reclamation plan to meet the standards found in 43 CFR 3809.420, and a monitoring plan to monitor the effect of operations are also required. An interim management plan showing how the project area would be managed during periods of temporary closure to prevent unnecessary and undue degradation must also be submitted. The operator also must submit a reclamation cost estimate. The BLM may require operational and baseline environmental information, and any other information, needed to ensure that operations will not cause unnecessary and undue degradation.

When a plan of operations is received, BLM would review it to make sure that it is complete. Where necessary, the BLM would consult with the State to ensure operations would be consistent with State requirements. In addition, the BLM would conduct any consultation required under the "National Historic Preservation Act" or "Endangered Species Act." On-site visits would be scheduled when necessary. BLM could require changes to the plan of operations to ensure that the performance standards found in 43 CFR 3809.420 would be met, and that no unnecessary or undue degradation of lands or resources would occur. In addition, site specific mitigating measures would be imposed when necessary. A financial guarantee covering the estimated cost of reclamation, as if BLM were to contract with a third-party, would have to be provided before operations could begin. The financial guarantee would have to be sufficient not only to cover costs of reclamation, but also costs associated with interim stabilization and compliance with Federal, state, and local environmental requirements while third-party contracts would be developed and executed.

BLM approval is necessary to occupy public land for more than 14 calendar days in any 90-day period within a 25-mile radius of the initially occupied site. Details for the submittal and approval of use and occupancy are contained in 43 CFR 3710. As defined in these regulations, occupancy means full or part-time residence on the public lands. It also means activities that involve residence; the construction, presence, or maintenance of temporary or permanent structures that may be used for such purposes; or the use of a watchman or caretaker for the purpose of monitoring activities. Residence or structures include, but are not limited to, tents, motorhomes, trailers, campers, cabins, houses, buildings, and storage of equipment or supplies. Also included are barriers to access, fences, gates, and signs intended to restrict public access.

Permanent structure means a structure fixed to the ground by any of the various types of foundations, slabs, piers, or poles, or other means allowed by building codes. The term also includes a structure placed on the ground that lacks foundations, slabs, piers, or poles, and that can only be moved through disassembly into its component parts or by techniques commonly used in house moving. The term does not apply to tents or lean-tos.

The disposal of sewage and gray-water would be subject to the rules and regulations of IDEQ. The disposal of garbage and other debris would be subject to all appropriate local, state, and Federal rules and regulations. Likewise, the drilling of any water wells would be subject to all Idaho Department of Water Resources requirements. Permanent structures would be subject to all state and county permitting. Copies of all required local and state approvals and permits would be filed with the BLM prior to allowing any occupancy.

Background on the Development of a Locatable Minerals Mine

The development of a mine from exploration to production can be divided into four stages. Each stage requires the application of more discriminating (and more expensive) techniques over a successively smaller land area to identify, develop, and produce an economic mineral deposit. A full sequence of developing a mineral project involves reconnaissance, prospecting, exploration, and mine development.

Reconnaissance: Reconnaissance-level activity is the first stage in exploring for a mineral deposit. This activity involves initial literature search of an area of interest, using available references such as publications, reports, maps, aerial photos, etc. The area of study can vary from hundreds to thousands of square miles. Activity that would normally take place includes large scale mapping, regional geochemical and geophysical studies, and remote sensing with aerial photography or satellite imagery. These studies are usually undertaken by academic or government entities, or major corporations.

The type of surface-disturbing activity associated with reconnaissance-level mineral inventory is usually no more than occasional stream sediment, or soil and rock, sampling. Minor off-road vehicle use could be required.

Prospecting: The prospecting area of interest is identified based on the information gathered during reconnaissance. This area could range from a single square mile to an entire mountain range of several hundred square miles. Activity that would take place in an effort to locate a mineral prospect includes more detailed mapping, sampling, geochemical and geophysical study programs. Also, this is the time when property acquisition efforts usually begin and most mining claims are located in order to secure ground while trying to make a mineral discovery. Prospecting on an annual basis is considered a minimum requirement, under the mining laws, to secure a claim.

Types of surface disturbing activity associated with prospecting would involve more intense soil and rock chip sampling using mostly hand tools, frequent off-road vehicle use, and placement and maintenance of mining claim monuments. This activity is normally considered "casual use" (43 CFR 3809.5) and does not require BLM notification or approval.

Exploration: Upon location of a sufficiently anomalous mineral occurrence, or favorable occurrence indicator, a mineral prospect is established and is subjected to more intense evaluation through exploration techniques. Activities that take place during exploration include those utilized during prospecting but at a more intense level in a smaller area. In addition, activities such as road building, trenching, and drilling are conducted. In later stages of exploration, an exploratory adit or shaft may be driven. If the prospect already has underground workings these may be sampled, drilled, or extended. Exploration activities utilize mechanized earth-moving equipment, drill rigs, etc., and may involve the use of explosives.

Typical exploration projects in the planning area could include: in-stream dredging with portable suction dredges, exploratory drilling which could include construction of new roads, use of explosives to sample rock outcroppings, and excavation of test pits. If the exploration project disturbs 5 acres or less, it is conducted under a "Notice" (43 CFR 3809.301) which requires the operator to notify BLM 15 days before beginning the activity. If the project disturbs more than 5 acres, it is conducted under a "Plan of Operations" (43 CFR 3809.401) and requires NEPA compliance before approval.

Mine Development: If exploration results show that an economically viable mineral deposit is present, activity would intensify to obtain detailed knowledge regarding reserves, possible mining methods, and mineral processing requirements. This would involve applying all the previously utilized exploration tools in a more intense effort. Once enough information is acquired, a feasibility study would be made to decide whether to proceed with mine development and what mining and ore processing methods would be utilized.

Once the decision to develop the property is made, the mine permitting process begins. Upon approval, work begins on development of the mine infrastructure. This includes construction of the mill, offices, and laboratory; driving of development workings if the property is to be underground mined, or pre-stripping if it is to be open pit mined; and building of access roads or haulage routes, and placement of utility services. During this time additional refinement of ore reserves is made.

Once enough facilities are in place, actual mine production begins. Concurrent with production there often are "satellite" exploration efforts to expand the mine's reserve base and extend the project life. Reclamation of the property is conducted concurrently with, or upon completion of, the mining operation. Often sub-economic resources remain unmined and the property is dormant, waiting for changes in commodity price or production technology that would make these resources economic.

Activities that occur on these lands include: actual mining, ore processing, tailings disposal, waste rock placement, solution processing, metal refining, and placement of support facilities such as repair shops, labs, and offices. Such activities involve the use of heavy earthmoving equipment and explosives for mining and materials handling, exploration equipment for refinement of the ore reserve base, hazardous or dangerous reagents for processing requirements, and general construction activities.

The size of mines varies greatly and not all mines would require all the previously mentioned facilities and equipment. Acreage involved can range from less than 5 acres to several hundred. Most mining operations in the planning area are under 5 acres. Any mining that involves greater than casual use, regardless of the number of acres, requires the submittal of a plan of operations, and appropriate NEPA analysis, under 43 CFR 3809.401 and .411.

Gold/Silver

Based on the mineral exploration over the past twenty years, it is anticipated that 2 to 3 notices per year would be submitted over the life of this plan. These notices could be located anywhere, but likely areas include BLM lands in the Silver Valley and around Murray, Idaho. Each notice covers exploration activities which cause less than 5 acres of disturbance, therefore it is anticipated that on average no more than 10 acres per year will be affected. Upon completion of activities covered by each notice, which is typically within 2 years of approval, the disturbed lands will be reclaimed as outlined in the proposal. This typically requires a 2 to 3 year time period for re-establishment of an acceptable vegetative cover.

In addition to the gold exploration mentioned above, it is anticipated that up to 5 notices for in-stream suction dredging would be filed during the life of the plan. In-stream dredging is usually a one to two person operation using a floating suction dredge with a 5 to 7 horsepower engine. The dredge pulls up all the gravel in the stream down to bedrock. The gravels are passed over a sluice box and are returned to the stream without the gold. This process does not require any chemicals. Most of the dredges have an intake nozzle opening of less than 5 inches diameter. Other activities associated with dredging include temporary occupancy and minor road and trail construction. These operations would be monitored pursuant to the regulations found in 43 CFR 3809.

APPENDIX I – RECOMMENDATIONS FOR COORDINATING LAND MANAGEMENT ACTIVITIES WITH ELK HABITAT PREFERENCES

Appendix I: Recommendations for Coordinating Land Management Activities with Elk Habitat Preferences

The following information is based on recommendations from Idaho Department of Fish and Game.

Timber Harvest Recommendations

1. Any silvicultural method that changes the vegetation so that it no longer meets the definition of cover should be confined to an area with a maximum width of 305 meters (1,000 feet) and should be bordered on all sides by cover not less than 243 meters (800 feet) width.

2. Regeneration harvest is usually preferred over other types of timber harvest techniques because it provides better forage and reduces the amount of future harvest activity in the area.

3. Maintain slash depth at less than 0.5 meters (1.5 feet) in order to minimize impact on elk movements, distribution and habitat use.

4. In appropriate habitat types, broadcast burn logging slash in the fall to get maximum elk forage protection.

5. Plan timber sales so maximum duration of disturbance in any one area is two years in succession. This can be accomplished with smaller sales, or scheduling larger sales by compartment in a certain sequence through contract stipulations. This would eliminate random logging over the entire sale area.

6. Refrain from logging areas when elk would normally be using them, if feasible. For example, do not log important summer habitat during that season especially if a viable option is to log during the winter.

7. If summer logging is planned on elk summer range, provide adjacent security areas at least as large as the area being disturbed for the animals to move to during periods of timber harvest and/or road building activity. Try to provide a ridge line between the disturbed area and security area. It is preferable to have several adjacent security areas available.

Road Recommendations

8. When major elk trails are bisected by roads, crossings should be provided across cut and fill slopes so they do not exceed natural gradients. This is especially necessary when cut slopes are over 2.5 meters (8 feet) high and/or have a greater than ¾ to 1 slope.

9. Vegetation removal along road sides should not extend any further from road edge than necessary for logging activities.

10. Slash depths adjacent to roads in cleared rights-of-ways should not exceed 0.5 meters (1.5 feet) in depth. In areas where this level of slash disposal is impractical, openings 16 feet wide thru the slash at 61 meter (200 foot) intervals are recommended, especially on ridges and trail crossings.

11. Maintain a minimum 91 meter (300 foot) buffer strip between open forest roads and openings which serve as feeding areas.

12. Roads that are to remain open should have two sight distance buffers adjacent to saddles, meadows, riparian areas, and ridge tops as these are usually major elk use areas. One sight distance hides 90% of an elk at 61 meters (200 feet).

13. New road construction should be temporary in nature and permanently closed/re-contoured when work is completed unless the new road is part of an extensive access management plan.

14. Install gates at onset of road building activity when the objective is to prevent human use patterns from becoming established. These gates should be closed and locked during any period of logging inactivity exceeding 24 hours.

15. Inform the public by all types of news media, including signs on gates, about reasons for and dates of road closures.

16. Replace gates with re-contoured slopes after logging activity where maximum elk security and habitat use is desired.

17. Revegetate the driving surface as well as cut and fill slopes on permanently closed roads.

18. Maintain buffer strips (that will qualify as hiding cover if possible) along roads left open during the normal elk use period. These buffers should be at least two sight distances wide when separating the road form an opening. One sight distance hides 90% of an elk at 61 meters (200 feet).

Protecting Special Habitat Components

19. Consult a wildlife biologist about the occurrence and/or importance of special habitat components on a case by case basis.

20. Maintain the value of licks and wallows by buffering from disturbance for at least two site distances. One sight distance hides 90% of an elk at 61 meters (200) feet.

21. Do not permit activities such as timber harvest, livestock grazing, or road building on established calving and rearing areas during the period of May 1 through July 15.

22. Protect known major elk travel routes with buffer strips on either side for at least two site distances. One sight distance hides 90% of an elk at 61 meters (200 feet).

APPENDIX J – WILD AND SCENIC RIVERS ELIGIBILITY AND SUITABILITY STUDY

SECTION 1
ELIGIBILITY STUDY

1.1 INTRODUCTION AND SUMMARY

The Wild and Scenic Rivers Act (WSRA) of October 2, 1968, (P.L. 90-542, as amended) directs federal agencies to consider potential Wild and Scenic River additions through their respective land use planning processes. In accordance with provisions of the Act, evaluation of potential rivers involves a sequential process to determine eligibility, tentative classification and then a recommendation on suitability for inclusion to the National Wild and Scenic Rivers System (NWSRS). BLM Manual 8351 provides process guidance. Eligibility and tentative classification determinations comprise an inventory. Subsequent suitability determinations are resource management plan outputs expressed as recommendations. Ultimate designation for inclusion to the NWSRS is a Congressional decision.

All named streams within the planning area with BLM surface ownership were screened against Wild and Scenic River eligibility criteria (Appendix A). This involved portions or all of 133 streams (Appendix B). Nearly all these streams were found to meet the free flowing eligibility criteria. Five free flowing stream segments were found to possess one or more "outstandingly remarkable" resource value and to be eligible for inclusion to the National Wild and Scenic River System. These include a segment of the Kootenai River, a segment of the Little North Fork Clearwater River and the entire length of Lost Lake Creek, Little Lost Lake Creek, and Lund Creek.

1.2 PROCESS OVERVIEW

BLM's geographic information system was used to identify and map rivers and streams with BLM surface ownership. The river and streams layer derived from the USGS (U.S. Geological Survey) National Hydrographic Data Set and the BLM surface ownership layer were combined to produce a list of 133 potentially free flowing streams to consider (Appendix B). Within their individual area(s) of expertise, staff specialists assessed these streams against WSRA eligibility criteria using available inventory information and their personal knowledge of the area (Appendix A). Process details include:

- No new resource inventories were conducted. Existing information was used.
- Stream segments previously studied for suitability were not reevaluated for eligibility. This involved one stream with BLM ownership, the St. Joe River.
- Only named streams were included on the potential rivers list. Un-named tributaries to these named streams were considered along with the named stream if BLM lands were involved.
- In accordance with BLM policy, only stream segments with predominant federal ownership were evaluated.
- In instances where BLM and National Forest lands are intermingled the total federal segment was considered.

1.2.1 Eligibility Criteria

Free Flowing

Free-flowing is defined in the WSRA as "existing or flowing in a natural condition without impoundment, diversion, straightening, rip-rapping, or other modification of the waterway." The existence of small dams or other structures does not automatically disqualify a stream from consideration for inclusion to the NWSRS. There is no minimum flow requirement and a stream need not be boatable or floatable in order to be eligible. Congress did not require rivers to be "naturally flowing". Impoundments upstream or downstream of a river segment which regulates the flow regime through it does not disqualify it from consideration.

Outstandingly Remarkable Values

The WSRA requires a river segment to contain one or more "outstandingly remarkable" value to be eligible for inclusion to the NWSRS. Seven specific resource values are listed and a general value category identified as "other similar values" is also included. The Act does not define the terms "outstandingly remarkable" or prescribe standards for evaluating individual resource values. Agency guidance for doing so is provided in BLM Manual 8351 and is summarized below.

- **Scenic:** The landscape elements of landform, vegetation, water, color and related factors result in notable or exemplary visual features or attractions. Additional factors such as seasonal variations in vegetation, scale of cultural modifications, and length of time negative intrusions are viewed can also be considered when analyzing scenic values. Diverse scenery and visual attractions exist over a majority of the public lands, are not common to other streams and are of a quality to attract visitors from outside the area.
- **Recreational:** Recreational opportunities are unique enough to attract visitors from outside the area. Visitors would be willing to travel long distances to use the water related resources for recreational purposes. Recreation opportunities could include but are not limited to sightseeing, wildlife observation, camping. Photography, hiking, fishing, hunting and boating. Also, interpretive opportunities may be exceptional.

- **Geologic:** The stream corridor provides an example(s) of a geologic feature, process or phenomenon that is rare, unusual, or unique to the region. The feature(s) may be in an unusual stage of development, represent a "textbook" example and/or represent a unique or rare combination of geologic features (e.g., erosional, volcanic, glacial, or other geologic structure).

- **Fisheries:** Fishery values may be judged on the relative merits of either fish populations or habitat, or a combination of both.

  Populations: The stream is a top producer of resident and/or indigenous fish species either nationally or regionally. Of significance may be the presence of wild or unique stocks or populations of listed or candidate threatened and endangered species. Diversity of species is also an important consideration.

  Habitat: The stream segment contributes to exceptionally high habitat for fish species indigenous to the region. Of particular significance is habitat for federally listed or candidate threatened and endangered species.

- **Wildlife:** Wildlife values may be judged on the relative merits of either wildlife populations or habitat, or a combination of both.

  Populations: Stream corridor lands support populations of resident or indigenous wildlife species important in the area or nationally. Of particular significance are species considered to be unique or populations of listed or candidate threatened and endangered species.

  Habitat: Stream corridor lands contribute to exceptionally high quality habitat for wildlife species important in the area or nationally, or they provide unique habitat or a critical link in habitat conditions for listed or candidate threatened and endangered species. Contiguous habitat conditions should be such that the biological needs of the species are met.

- **Cultural:** The stream corridor contains prehistoric sites that are rare, have unusual characteristics, or possess exceptional human-interest values. Sites may have national or regional importance for interpreting prehistory, be rare, or represent an area where a culture or cultural period was first identified and described. Sites may have been used by two or more cultural groups or may have been used for rare or sacred purposes.

- **Historical:** The stream corridor contains sites or features associated with a significant event, an important person, or a cultural activity of the past that was rare or unusual in the area. Sites or features listed or eligible for inclusion in the National Register of Historic Places may be of particular significance.

- **Other Similar Values:** Specific evaluation guidelines have not been developed for the "other similar values" category. Additional values including but not limited to hydrologic, ecologic diversity, paleontologic, botanic, and scientific

study opportunities should be considered in a manner consistent with and similar to the forgoing resource evaluations.

1.2.2 Tentative Classification

A second step of the inventory process is to assign a tentative classification to eligible river segments (Appendices C and D). The WSRA specifies three classification categories: wild, scenic, and recreational. Classification is based on the level or degree of development of the river and adjacent lands (Appendix C). Each category is specifically defined in the Act as follows:

- **Wild River Areas:** "Those rivers or sections of rivers that are free of impoundments and generally inaccessible except by trail, with watersheds or shorelines essentially primitive and waters unpolluted. These represent vestiges of primitive America".
- **Scenic River Areas:** "Those rivers or sections of rivers that are free of impoundments, with shorelines or watersheds still largely primitive and shorelines largely undeveloped, but accessible in places by roads."
- **Recreational River Areas:** "Those rivers or sections of rivers that are readily accessible by road or railroad, that may have some development along their shorelines, and that may have undergone some impoundment or diversion in the past."

1.3 Eligibility Review Results

1.3.1 Kootenai River

Eligible Segment: Montana state line downstream to and including Hideaway Islands

Total Length – 22.5 kilometers (14 miles)

BLM Administered Frontage – 9.5 kilometers (5.73 miles)

Tentative Classification: Recreational

Outstandingly Remarkable Value(s): Fisheries, Wildlife, Botanic

This stream segment starts at the border of Idaho and Montana and extends downstream to the lower end of Hideaway Islands. Hideaway Islands are designated a Research Natural Area. The shoreline ownership is intermingled BLM, National Forest, state and private lands. It flows through a defined canyon without road or trail access. A Burlington Northern rail line follows the south shoreline for its entire length so this segment best meets the recreational river classification category. Below this eligible segment the river continues for more than 80 kilometers (50 miles) before entering Canada. This downstream segment may also be eligible but contains no BLM lands to consider. An upstream segment in Montana may also be eligible but is outside the planning area and contains no BLM land to consider. The Forest Service, through their forest plan revision, will determine eligibility of the Montana segment of the River.

The Kootenai River provides spawning and rearing habitat for the endangered white sturgeon, threatened bull trout, and BLM sensitive burbot and westslope cutthroat trout. The Bonneville Power Administration is proposing to add nutrients to this segment of the river to (1) replace nutrients trapped by Libby Dam and (2) enhance fish production in the river. The associated riparian habitat on BLM public lands are either Proper Functioning Condition or Functional At-Risk.

Bald eagles nest along the Kootenai River from the Montana state line downstream to the Hideaway Islands. The Moyie nest was first discovered in 1990 and produced 7 young eagles in 15 years (0.47 per year). The Katka nest was first discovered in 1996 and produced 4 young eagles in 9 years (0.44 per year). The Crossport nest was first discovered in 1995 and produced 11 young eagles in 10 years (1.1 per year).

Hideaway Islands were designated as an RNA/ACEC for unique botanical values. The islands contain a good example of a black cottonwood/red-osier dogwood riparian plant community in various stages of ecological succession. Three species of cottonwood are found on the islands: black cottonwood, narrowleaf cottonwood, and eastern cottonwood. Eastern cottonwood is found primarily east of the Mississippi River, with a disjunct distribution in the western U.S. This species is uncommon in Idaho. The Idaho Conservation Data Center (CDC) ranks the black cottonwood/red-osier dogwood community type as "S1" in Idaho. An S1 rank is assigned to plant species or communities that are critically imperiled statewide (typically 5 or fewer occurrences or less than 5 percent of native range currently occupied by high quality examples of type) or especially vulnerable to extirpation from the state. Hideaway Islands is managed by BLM in a non-destructive and non-manipulative manner to preserve the existing plant communities in an unmodified condition for the primary purpose of research and education.

1.3.2 Little North Fork Clearwater River

Eligible Segment: Source at Fish Lake downstream to National Forest boundary

Total Length – 5.8 kilometers (3.61 miles)

BLM Administered Length – 4.1 kilometers (2.56 miles)

Tentative Classification: Wild, Recreational

Outstandingly Remarkable Value(s): Fisheries

This stream segment starts at Fish Lake within the Grandmother Mountain Wilderness Study Area (WSA). Outside the WSA it flows east across a Forest Service section and then again onto BLM land. The stream segment considered here terminates at the section line common to sections 1 and 12, T. 43 N., R. 4 E., B.M. Beyond this point the stream continues but is located all on National Forest land. A trail starts at Forest Road #1925 and parallels the stream providing access to Fish Lake. The trail is a two track primitive road that is maintained to a trail width. This stream segment accessible by trail best meets the wild river classification category. The remaining downstream segment is crossed and followed by forest roads and best meets the recreational river classification

category. The entire stream was identified by the Forest Service as eligible in the 1987 Idaho Panhandle National Forests Forest Plan.

The Little North Fork of the Clearwater River provides spawning and rearing habitat for the threatened bull trout and BLM sensitive westslope cutthroat trout. Bull trout redds have been counted on this creek since 1996, and have averaged approximately 0.48 redds per stream mile. The associated riparian habitat on BLM public lands is in Proper Functioning Condition.

1.3.3 Lost Lake Creek

Eligible Segment: Entire stream from Lost Lake to Little North Fork Clearwater R.

Total Length – 5.5 kilometers (3.43 miles)

BLM Administered Length – 1.7 kilometers (1.06 miles)

Tentative Classification: Wild, Scenic

Outstandingly Remarkable Value: Fisheries

An intermingled land ownership pattern exists along this stream. It begins at Lost Lake on National Forest land and then crosses BLM land within the Grandmother Mountain WSA. It then alternates back and forth from National Forest to private land lands twice before terminating on BLM land where it intersects the Little North Fork Clearwater River. A foot trail starts at Forest Road #1925 and follows the stream accessing Lost Lake. It starts as a two track primitive road and then narrows to a single-track trail after entering the WSA. This stream segment accessible by trail best meets the wild river classification category. The remainder downstream from Forest Road #1925 best meets the scenic river classification category.

Lost Lake Creek provides spawning and rearing habitat for the threatened bull trout and BLM sensitive westslope cutthroat trout. One bull trout redd was counted in 2000 and again in 2004. The associated riparian habitat on BLM public lands is in Proper Functioning Condition.

1.3.4 Little Lost Lake Creek

Eligible Segment: Entire stream from Little Lost Lake to Little North Fork Clearwater R.

Total Length – 5.0 kilometers (3.09 miles)

BLM Administered Length – 3.4 kilometers (2.13 miles)

Tentative Classification: Wild

Outstandingly Remarkable Value(s): Fisheries

All BLM lands on this stream are within the Grandmother Mountain WSA. The lower portion of the stream crosses National Forest land before terminating at its confluence with the Little North Fork Clearwater River. A primitive road on National forest land is

shown on the USGS 7.5-minute Widow Mountain quadrangle but does not exist. A foot trail provides access to Little Lost Lake. The trail follows a ridge parallel to the stream and is about 0.4 kilometers (0.25 mile) off the stream for most of its length. The trail starts as a two track primitive road and then narrows to a single-track trail after entering the WSA.

Little Lost Lake Creek provides spawning and rearing habitat for the threatened bull trout and BLM sensitive westslope cutthroat trout. Bull trout redds have been counted on this creek since 1996, and has averaged approximately 0.60 redds per stream mile. The associated riparian habitat on BLM public lands is in Proper Functioning Condition.

Members of the experimental, nonessential population of gray wolf inhabit the greater area that is partially drained by Lost Lake Creek. This population is treated as a proposed species for federal listing under the ESA. This area also provides habitat for the threatened Canada lynx.

1.3.5 Lund Creek

Eligible Segment: Entire stream from its source to Little North Fork Clearwater River

Total Length – 6.2 kilometers (3.88 miles)

BLM Administered Length: 5.0 kilometers (3.09 miles)

Tentative Classification: Wild

Outstandingly Remarkable Value(s): Fisheries, Botanic

All BLM lands on this stream are within the Grandmother Mountain Wilderness Study Area. Approximately the upper half of the stream is within the Lund Creek Research Natural Area. The entire drainage is largely pristine. The lower portion of the stream crosses National Forest lands before terminating at its confluence with the Little North Fork Clearwater River. An un-maintained primitive road used as a trail is located on National Forest land and travels a short distance up the drainage. The USGS 7.5-minute Widow Mountain quadrangle shows this primitive road as a trail and shows it extending 1.6 kilometers (one mile) upstream onto BLM lands. This trail is overgrown, not maintained and for all practical purposes does not exist.

Lund Creek provides spawning and rearing habitat for the threatened bull trout and BLM sensitive westslope cutthroat trout. Bull trout redds have been counted on this creek since 1996, and has averaged approximately 1.22 redds per stream mile. This is due to the fact that Lund Creek has the best water temperatures on BLM public lands within the Little North Fork drainage for bull trout. The aquatic habitat is in very good ecological condition, and the associated riparian habitat on BLM public lands is in Proper Functioning Condition.

The Lund Creek RNA/ACEC was designated to protect unique natural features and ecological diversity. The area contains stands of mature mountain hemlock and

subalpine plant communities dominated by subalpine fir, whitebark pine, and mountain hemlock. A number of aquatic features such as Pinchot Marsh, Little Lost Lake, and a bog, marsh, streams and waterfalls are present. Lund Creek itself and its associated riparian plant communities are rated as being in very good ecological condition. Bogs and marshes in the Grandmother Mountain area are considered subalpine peatlands, characterized by a mixture of plant species common to the mountain systems of western North America, as well as plant species more typical of boreal habitats occurring hundreds of miles north of the planning area. Although peatlands comprise a very small percentage of vegetation across the landscape they are among the most floristically diverse vegetation types. Scientists and educators are encouraged to use the area for study purposes. However, all uses must be non-destructive. No vegetative manipulation (including timber harvest) or vehicle use is permitted.

SECTION 2
SUITABILITY STUDY

2.1 INTRODUCTION

The purpose of the study phase is to determine whether eligible river segments are suitable or unsuitable for inclusion in the National System, per the criteria of the WSR Act. The suitability evaluation does not result in actual designation but only a suitability determination for designation. The BLM does not recommend any stream segments for designation into the National System, and no stream segment studied is or will be automatically designated as part of the National System. Only Congress can designate a wild and scenic river. In some instances, the Secretary of the Interior may designate a wild and scenic river when the governor of a state, under certain conditions, petitions for a river to be designated. Congress will ultimately choose the legislative language if any suitable segments are presented to them. Water protection strategies and measures to meet the purposes of the WSR Act will be the responsibility of Congress in any legislation proposed. Rivers found unsuitable will be dropped from further consideration and will be managed according to the objectives outlined in the Coeur d' Alene (CdA) Resource Management Plan (RMP). The CdA FO is currently preparing a combined RMP and Environmental Impact Statement (EIS).

During the scoping period for the RMP, two comment letters were received identifying wild and scenic rivers as an issue. Comments provided within the scoping letters pertained to BLM's need to conduct a wild and scenic river eligibility and suitability study during the RMP process. No specific river segments were identified. One of the letter authors stated that they felt that additions to the wild and scenic rivers system were warranted and appropriate but did not specifically name any segments.

Impacts that would occur from designating or not designating the eligible and suitable river segments will be analyzed in the EIS associated with the RMP. Public review and comment on suitability determinations included in the Draft RMP are considered before the BLM makes final suitability determinations.

The following eight factors, identified in BLM Manual Section 8351 (BLM 1992), are applied to each eligible river segment when completing the suitability study:

1. Characteristics that do or do not make the river a worthy addition to the National System;
2. The status of land and mineral ownership, use in the area, and associated or incompatible uses;
3. Reasonably foreseeable potential uses of the land and related waters that would be enhanced, foreclosed, or curtailed if the area were included in the National System and values that would be foreclosed or diminished if the area were not designated;
4. Federal, state, tribal, local, public, or other interest in designating or not designating the river;
5. Estimated cost of acquiring necessary lands and interests in lands and administering the area, if designated;
6. Ability of the agency to manage and protect the river area or segment as a wild and scenic river or other means to protect the identified values other than wild and scenic river designation;
7. Historical or existing rights that could be adversely affected with designation; and
8. Other.

2.2 Interim Management of Suitable Segments

BLM guidance requires that interim management be developed and followed to protect the free-flowing nature, outstandingly remarkable values, and recommended classification of suitable segments until congressional action regarding designation is taken. Following BLM review of suitability determinations, interim management measures will be developed for each suitable segment.

2.3 Suitability Determinations for the Coeur d'Alene Field Office

This section contains a discussion of eight suitability factors in relationship to each of the five segments determined to be eligible in Section 1 (see Map #71 in Volume III of the Draft Coeur d'Alene RMP/EIS). These factors were described above in Section 2.1.

Segment 1: Kootenai River

1. Characteristics that do or do not make the river a worthy addition to the National System:

   The outstandingly remarkable values that qualify this river segment as eligible for inclusion in the NWSRS are fisheries, wildlife, and botanical, as described in Section 1.3.1. Within the BLM-managed portions of this segment, there is high quality spawning and/or rearing habitat for Kootenai sturgeon, bull trout, burbot, and westslope cutthroat trout. Bald eagles nest and forage along the Kootenai River

from the Montana state line downstream to Bonner's Ferry. Botanic Outstandingly Remarkable Values (ORVs) are related to the unique botanical values located within the Hideaway Islands RNA/ACEC.

A Burlington Northern rail line follows the south shoreline for the entire length of this segment.

River flow through the BLM-managed sections is regulated by Libby Dam operations in Montana. Libby Dam is operated by the Bonneville Power Administration. Current operations provide sufficient water for fisheries and wildlife-related ORVs. However, some deterioration to sturgeon spawning habitat has occurred, requiring spawning mats to be placed in the river in certain areas to provide adequate spawning substrate. In addition, the Bonneville Power Administration is proposing to add nutrients to this segment of the river to replace nutrients trapped by the dam and to enhance fish production.

Water quality concerns have been identified by the EPA for the lower Kootenai River. In 2002 an assessment of this segment of the Kootenai River was found to exceed temperature criteria, and submitted to EPA as category 3 waters for Idaho's proposed 2002 integrated report. Category 3 in an integrated report is the same as the old 303(d) listed water, waters for which a TMDL needs to be developed. EPA hasn't taken any action at this time. The EPA is expected to include the 2002 findings when it evaluates the 2004 integrated report. None of the mainstem Kootenai River segments have gone through the whole process (public, regulatory) to be officially "listed" by the EPA (pers. Com. Steed 2005). This segment is listed as non-supporting for cold water aquatic species due to elevated water temperatures. It is believed that a lack of adequate riparian vegetation and associated shade is a major contributor to the elevated water temperatures. The riparian habitat on portions of this segment that occur on public lands managed by BLM has been identified as either in Proper Functioning Condition or Functional At-Risk.

2. The status of land and mineral ownership, use in the area, and associated or incompatible uses:

   There is a combination of federal, state, and private land along this segment. Federal land is managed either by BLM or USFS. The BLM manages land adjacent to 9.2 kilometers (5.73 miles) of the 22.5 kilometer (14 mile) segment being studied; this represents 41 percent of the segment length. However, the BLM does not necessarily manage lands on both banks of the river within the 9.2 kilometers (5.73 miles) (See Map #71 in Volume III of the Draft Coeur d'Alene RMP/EIS). An evaluation of land status and ownership in the study corridor, defined as within 0.4 kilometer (0.25 mile) on either side of the river, was conducted. Within the study corridor, not including islands, BLM manages 494 acres (13.1%), USFS manages 1,147 acres (30.3%) and the State of Idaho manages 150 acres (4%). The remaining 1,987 acres (52.6%) of land are privately held.

Federal lands within this segment are encumbered by two withdrawals: 1) a 1910 Executive Order withdrawing the parcels as a powersite reserve, and 2) a 1944 Secretarial Order withdrawal for a powersite classification.

In addition, there are sand and gravel operations adjacent to public land along the river.

3. Reasonably foreseeable potential uses of the land and related waters that would be enhanced, foreclosed, or curtailed if the area were included in the National System, and values that would be foreclosed or diminished if the area were not designated:

The Two Tail timber harvest lease is located on BLM-managed lands within the river corridor in this segment. This timber harvest operates in accordance with the stipulations described in INFISH, resulting in a buffer zone designed to protect river-related values. INFISH stipulations include incorporating no harvest/activity buffers into any future timber sales within the riparian areas. If the segment were designated in the NWSRS, the buffer zone would include all lands within the designated corridor, currently defined as within 0.4 kilometer (0.25 mile) of the river. This would not be a significant change from current management.

Grazing occurs on adjacent private lands and occasionally results in unauthorized grazing on BLM lands. Designation could result in stricter enforcement of grazing restrictions on BLM lands.

WSR designation would complement the existing protection given to the rare riparian plant communities growing in the Hideaway Islands RNA/ACEC. This RNA/ACEC is managed in a nondestructive and non-manipulative manner.

4. Federal, state, tribal, local, public, or other interest in designating or not designating the river:

At this time, no specific federal, state, tribal, local, or public entity has expressed interest in this segment of the Kootenai River regarding wild and scenic designation. BLM anticipates comments on wild and scenic river designation from interested parties to be received during the Draft RMP comment period.

The State of Idaho has jurisdiction of the streambed and consequently has a vested interest in designating or not designating this segment.

Licensed fishing guides operate in this segment of the Kootenai River. Fishing guides are regulated by Idaho Outfitters and Guides Licensing Board.

The Kootenai Tribe, Idaho Fish and Game, the county, local fishing clubs, outfitters, private landowners, and authorized users also have an interest.

5. Estimated cost of acquiring necessary lands, interests in lands, and administering the area if designated:

   Scenic and or conservation easements on private lands would be required to effectively manage for the protection of fish and wildlife Outstandingly Remarkable Values (ORVs). No specific parcels have been identified as being required. Easements and land would only be acquired on a willing seller basis. The estimated cost of easements in this area is $10,000 an acre.

6. Ability of the agency to manage and protect the river area or segment as a wild and scenic river, or other means to protect the identified values other than Wild and Scenic River designation:

   Managing BLM-administered lands for the protection of ORVs would be relatively simple. BLM would continue to implement INFISH standards and guidelines as a means of protecting riparian conservation areas. Additionally, because many of the ORVs are linked to federally listed species, the BLM would continue to ensure compliance with the ESA for the protection of these species and their habitats. ESA compliance and management resulting from WSR designation would be compatible.

   Managing for the protection of ORVs would need to be coordinated with the USFS, which manages 30.3 percent of the riparian corridor within 0.4 kilometer (0.25 mile) of the river. Land use on USFS lands are also constrained by the ESA to protect listed species.

   The Hideaway Islands RNA/ACEC is near the downstream end of the WSR-eligible river segment. An ACEC nomination is being considered that would involve all of the purple lands highlighted for the WSR review, except for the small triangle of land in the Two Tail vicinity (western side of map).

   Without acquiring easements, potential uses on private lands adjacent to public lands could adversely affect ORVs within public land agency jurisdiction. Increased sediment from upstream and regulated water flows could affect the amount and quality of fisheries habitats within the portions of river flowing through public land.

   There are no local or state zoning or land use regulations that would prevent development along the river. Consequently, potential development on private parcels could be incompatible with WSR designation.

7. Historical or existing rights that could be adversely affected with designation:

   The Kootenai Tribe may have historical rights for fishing, hunting, and gathering. The Kootenai River may also hold spiritual significance to the tribe. The tribe's right to alter the stream through installation of dams or by channelizing is unknown.

8. Other:

   No other major issues or concerns regarding suitability of this segment have been identified in the land use planning process.

Segment 2: Little North Fork of Clearwater River

1. Characteristics that do or do not make the river a worthy addition to the National System:

   This segment contains outstandingly remarkable fisheries values. These values are dependent upon the high quality spawning and rearing habitat for bull trout and westslope cutthroat trout.

   The segment from USFS road #1925 upstream to Fish Lake is accessible by trail. The trail is composed of an old two track road that is currently maintained to a trail width.

   The segment from USFS road #1925 to the downstream end of the segment is accessible by a USFS road that crosses and parallels the segment.

   The segment has no water quality issues.

2. The status of land and mineral ownership, use in the area, and associated or incompatible uses:

   The BLM manages lands along 4.1 kilometers (2.56 miles or 71%) of this 5.8 kilometer (3.61 mile) segment. The remaining 1.7 kilometer (1.05 mile) long section (29%) is managed by the USFS (See Map #71 in Volume III of the Draft Coeur d'Alene RMP/EIS). Within the study corridor (defined as 0.4 kilometer [0.25 mile] on each side of the river) BLM manages 67 percent (858 acres) of the land, USFS manages 32 percent (410 acres) and private landowners control less than 1% (9 acres). The private land holdings are not adjacent to the river and would likely be excluded from the designated corridor. The entire Little North Fork Clearwater, including this portion, was identified by the USFS as eligible for WSR consideration (USFS 1987 Idaho Panhandle National Forests Forest Plan). The USFS has not completed a suitability study for this segment.

   A query of BLM's LR2000 database revealed no active mining claims on the identified BLM lands or adjacent USFS lands. A review of the Mines and Prospects of the Wallace Quadrangle, Idaho indicated no historical activity on the identified

BLM lands. There have been gold, silver, copper, lead, mica, feldspar, and sand and gravel prospects on surrounding lands, but none are within 1.6 kilometer (one mile) of the BLM lands. This information agrees with the mineral potential classification assigned to this region in the Mineral Occurrence and Development Potential Report, Coeur d'Alene Field Office Planning Area (BLM 2005). Current information suggests it is a hardrock area with low potential for all minerals.

3. Reasonably foreseeable potential uses of the land and related waters that would be enhanced, foreclosed, or curtailed if the area were included in the National System and values that would be foreclosed or diminished if the area were not designated:

   Much of this segment is within the Grandmother Mountain Wilderness Study area and is managed according to interim wilderness management guidelines. Management measures that would result from WSR designation would likely be similar to the interim management being implemented.

   Designation of this segment would result in implementing riparian no harvest/activity buffers for future timber sales to protect the corridor. However, this would not be a significant change from current ESA requirements for the protection of bull trout in the segment. Timber harvests have occurred on lands adjacent to this segment. Designation of this segment may increase the buffer zone resulting in additional protection from potential sedimentation associated with timber harvests.

   Typical recreation uses in this section include fishing, primitive camping, big game hunting, and trail activities. The trail that parallels the segment is currently open to ATVs and motorcycles and requires occasional maintenance. Forest roads are open to all classes of vehicles. If trail use results in adverse impacts to fish habitat, closure to motorized use may be required.

4. Federal, state, tribal, local, public, or other interest in designating or not designating the river:

   At this time, no specific federal, state, tribal, local, or public entity, with the exception of the USFS, has expressed interest in this segment of the Little North Fork Clearwater River regarding wild and scenic designation. BLM anticipates comments on wild and scenic river designation from interested parties to be received during the Draft RMP comment period.

   The USFS identified the entire river as eligible in the 1987 Idaho Panhandle National Forests Forest Plan.

   The Coeur d'Alene tribe would potentially have an interest in whether this segment becomes designated.

Idaho Department of Fish and Game, Shoshone County, local fishing clubs and outfitters, nearby private landowners, and authorized users potentially have an interest in whether this segment becomes designated.

5. Estimated cost of acquiring necessary lands, interests in lands, and administering the area if designated:

   All lands being considered for designation are federally managed; there would be no need to acquire additional properties. However, coordination with USFS would be necessary to ensure protection of the river values.

6. Ability of the agency to manage and protect the river area or segment as a Wild and Scenic River, or other means to protect the identified values other than Wild and Scenic River designation:

   A portion of the segment is included in the Grandmother Mountain Wilderness Study Area (WSA). Resource values, including fisheries values, are protected in this area under interim management measures. Designation as a wilderness area or removal of WSA status is at the discretion of Congress. Consequently, resource protection afforded by interim management is only temporary.

   The ESA provides additional protection of fish and riparian habitats.

   Riparian Conservation Areas will be defined based on INFISH standards and guides. Additionally, the area is being considered for ACEC designation, which could result in protective management measures.

   Effective protection of fisheries ORVs would require the cooperation of the USFS on adjacent USFS-managed lands.

7. Historical or existing rights that could be adversely affected with designation:

   The Coeur d'Alene Tribe may have historical rights for fishing, hunting, and gathering. The Little North Fork of the Clearwater River may also hold spiritual significance to the tribe. The tribe's right to alter the stream by installing dams or by channelizing is unknown.

8. Other:

   No other major issues or concerns regarding suitability of this segment have been identified in the land use planning process.

Segment 3: Lost Lake Creek

1. Characteristics that do or do not make the river a worthy addition to the National System:

This segment contains outstandingly remarkable fisheries values. The values are dependent on the high quality spawning and rearing habitat for bull trout and westslope cutthroat trout.

A foot trail starts at Forest Road #1925 and follows the stream to Lost Lake. The trail starts as a two-track primitive road and narrows to a single-track trail after entering the Grandmother Mountain WSA.

The segment has no water quality issues.

2. The status of land and mineral ownership use in the area and associated or incompatible uses:

Land status along this segment is intermingled between BLM, USFS, and private landowners. The segment length is 5.5 kilometer (3.43 miles), with BLM managing lands along 1.7 kilometer (1.06 miles or 31%) (See Map #71 in Volume III of the Draft Coeur d'Alene RMP/EIS). An evaluation of land status and ownership within 0.4 kilometer (0.25 mile) on either side of the river was conducted; this is referred to as the 0.8 kilometer (0.25 mile) study corridor. Within the study corridor BLM manages 443 acres (35%), USFS manages 599 acres (47%), and 225 acres (18%) are privately held.

A query of BLM's LR2000 database (accessed January 2005) revealed no active mining claims on the identified BLM lands or adjacent USFS lands. A review of the Mines and Prospects of the Wallace Quadrangle, Idaho indicated no historical activity on the identified BLM lands. There have been gold, silver, copper, lead, mica, feldspar, and sand and gravel prospects on surrounding lands, but none are within 1.6 kilometer (one mile) of the BLM lands. This information agrees with the mineral potential classification assigned to this region in the Mineral Occurrence and Development Potential Report, Coeur d'Alene Field Office Planning Area (BLM 2005). Current information suggests it is a hardrock area with low potential for all minerals.

Public land status in this area is unencumbered, there are no existing leases, ROWs, utility corridors or withdrawals associated with these lands.

3. Reasonably foreseeable potential uses of the land and related waters that would be enhanced, foreclosed, or curtailed if the area were included in the National System and values that would be foreclosed or diminished if the area were not designated:

Timber harvest has occurred on BLM lands adjacent to this river and could potentially occur again. If the segment were designated as a WSR, future timber harvests and construction of roads would not be permitted within the designated corridor. This would result in a specific riparian no harvest/activity buffer zone incorporated into any future timber sales in this area.

The trail that runs alongside the segment is open to ATVs and motorcycles. Trail maintenance activities occur along this segment. Management of these activities must comply with the ESA to ensure protection of bull trout habitat. Designating this segment is not likely to change trail use and maintenance activities. Designation could be considered complimentary with WSA interim management.

4. Federal, state, tribal, local, public, or other interest in designating or not designating the river:

   At this time, no specific federal, state, tribal, local, or public entity has expressed interest in this segment of the Lost Lake Creek regarding wild and scenic designation. BLM anticipates comments on wild and scenic river designation from interested parties to be received during the Draft RMP comment period.

   Several different entities would be interested in whether this segment is designated or not designated for inclusion in the National Wild and Scenic Rivers System. The primary entities would be the USFS and the private landowners along this segment. The USFS manages lands along Lost Lake and along two other sections downstream before reaching BLM lands at the confluence with the Little North Fork Clearwater River. All the private lands along this segment are controlled by a timber company and are subject to logging. Management measures resulting from designation would be limited to federal lands and would not affect the private parcels. However, BLM would pursue acquisitions and/or conservation easements on a willing seller basis along the river on private parcels.

   Other entities potentially interested include the Coeur d'Alene Tribe, Idaho Fish and Game, Shoshone County, local fishing clubs, outfitters, and other authorized users.

5. Estimated cost of acquiring necessary lands, interests in lands, and administering the area if designated:

   Fee acquisition of the private parcels along this segment would be desirable. BLM would pursue acquisition on a willing seller basis only. Land costs are estimated at $3,000 per acre.

6. Ability of the agency to manage and protect the river area or segment as a Wild and Scenic River or other means to protect the identified values, other than Wild and Scenic River designation:

   Protection of fisheries ORVs on BLM lands would likely be accomplished through BLM's implementation of the INFISH standards and guidelines for the protection of Riparian Habitat Conservation Areas (RHCA). RHCAs are portions of watersheds where riparian-dependent resources receive primary emphasis, and management activities are subject to specific standards and guidelines.

For "fish-bearing streams," Interim RHCAs consist of the stream and the area on either side of the stream extending from the edges of the active stream channel to the greater of:

- the top of the inner gorge or to the outer edges of the 100-year floodplain, or
- to the outer edges of riparian vegetation, or
- to a distance equal to the height of the two site potential trees or 300 feet slope distance (600 feet including both sides of the stream channel).

Depending on the topography, the RHCA could be smaller or larger than the wild and scenic river corridor, if designated.

Cooperative management with USFS in adjacent parcels would be required to ensure protection of fisheries ORVs.

An ACEC nomination is being considered for this area and could provide necessary protection depending on management measures developed.

BLM and USFS also manage this riparian corridor according to the requirements of the ESA for the protection of bull trout and bull trout habitat.

A portion of this area is within the Grandmother Mountain WSA. Interim management affords limited protection of fisheries ORVs in the areas within the WSA. These management measures, although effective, are only interim and could be removed by congressional action.

Consequently, potential development on private parcels could be incompatible with WSR designation.

7. Historical or existing rights that could be adversely affected with designation:

   The Coeur d'Alene Tribe may have historical rights for fishing, hunting, and gathering. Lost Lake Creek may also hold spiritual significance to the tribe. The right of the Coeur d'Alene Tribe to alter the stream by installing dams or by channelizing is unknown.

8. Other:

   No other major issues or concerns regarding suitability of this segment have been identified in the land use planning process.

Segment 4: Little Lost Lake Creek

1. Characteristics that do or do not make the river a worthy addition to the National System:

   This segment contains outstandingly remarkable fisheries values related to its spawning and rearing habitat for bull trout and westslope cutthroat trout.

A foot trail parallels the segment providing access to Little Lost Lake near the headwaters of Little Lost Lake Creek. The trail is located about 0.4 kilometer (0.25 mile) away from the stream. The trail is a two-track primitive road on the USFS downstream portion and narrows to a single-track trail after entering BLM land in the Grandmother Mountain WSA.

This area provides habitat for the federally listed threatened Canada lynx and is occupied by members of an experimental nonessential population of gray wolf.

The segment has no water quality issues.

2. The status of land and mineral ownership, use in the area, and associated or incompatible uses:

All of the land adjacent to this segment is federally managed by either BLM or USFS. BLM manages lands along 3.42 kilometers (2.13 miles or 69%) of the 5.0 kilometers (3.09 mile) long segment. USFS manages lands along the remaining 1.5 kilometer (0.96 miles) (See Map #71 in Volume III of the Draft Coeur d'Alene RMP/EIS). Within the study corridor, BLM manages 66 percent (793 acres), USFS manages 31 percent (371 acres) and private landowners control 3 percent (42 acres). Private landholdings are located within the study corridor are not located adjacent to the river. This private parcel is controlled by a timber company and is subject to timber harvest.

A query of BLM's LR2000 database (accessed January 2005) revealed no active mining claims on the identified BLM lands or adjacent USFS lands. A review of the Mines and Prospects of the Wallace Quadrangle, Idaho indicated no historical activity on the identified BLM lands. There have been gold, silver, copper, lead, mica, feldspar, and sand and gravel prospects on surrounding lands, but none are within 1.6 kilometer (one mile) of the BLM lands. This information agrees with the mineral potential classification assigned to this region in the Mineral Occurrence and Development Potential Report, Coeur d'Alene Field Office Planning Area (BLM 2005). Current information suggests it is a hardrock area with low potential for all minerals.

Public land status in this area is unencumbered, there are no existing leases, ROWs, utility corridors or withdrawals associated with these lands.

3. Reasonably foreseeable potential uses of the land and related waters that would be enhanced, foreclosed, or curtailed if the area were included in the National System, and values that would be foreclosed or diminished if the area were not designated:

If the segment were designated as a WSR, future timber harvests, and construction of roads would not be permitted within the designated corridor. This would result in a specific riparian no harvest/activity buffer zone incorporated into any future timber sales in this area.

The trail that runs alongside the segment is currently open to ATVs and motorcycles. Trail maintenance activities occur along this segment. Management of these activities must comply with the ESA to ensure protection of bull trout habitat. Designating this segment is not likely to change trail use and maintenance activities. Designation would be considered complimentary with WSA interim management.

Typical recreation uses in this area include fishing, primitive camping, and big game hunting. Designation would not likely affect these uses.

4. Federal, state, tribal, local, public, or other interest in designating or not designating the river:

   At this time, no specific federal, state, tribal, local, or public entity has expressed interest in this segment of the Little Lost Lake Creek regarding wild and scenic designation. BLM anticipates comments on wild and scenic river designation from interested parties to be received during the Draft RMP comment period.

   Several different entities would be interested in whether this segment is designated or not designated for inclusion in the National Wild and Scenic Rivers System. The primary entity would be the USFS. The USFS manages lands along the lower section between BLM lands and the confluence with the Little North Fork Clearwater River. Although there are no private landholdings immediately adjacent to the river, there are private lands within the watershed controlled by a timber company and subject to logging. Management measures resulting from designation would be limited to federal lands and not affect the private parcels.

   Other entities potentially interested include the Coeur d'Alene Tribe, Idaho Fish and Game, Shoshone County, local fishing clubs, outfitters, and other authorized users.

5. Estimated cost of acquiring necessary lands, interests in lands, and administering the area if designated:

   All lands along the river segment are federally managed, so no land acquisition would be required or pursued. Coordination with USFS on designation and management would be necessary to protect ORVs.

6. Ability of the agency to manage and protect the river area or segment as a Wild and Scenic River or other means to protect the identified values:

   Protection of fisheries ORVs on BLM lands would likely be accomplished through BLM's implementation of the INFISH standards and guidelines for the protection of Riparian Habitat Conservation Areas (RHCA). RHCAs are portions of watersheds where riparian dependent resources receive primary emphasis, and management activities are subject to specific standards and guidelines.

For "fish-bearing streams," Interim RHCAs consist of the stream and the area on either side of the stream extending from the edges of the active stream channel to the greater of:

- the top of the inner gorge or to the outer edges of the 100-year floodplain, or
- to the outer edges of riparian vegetation, or
- to a distance equal to the height of the two site potential trees or 300 feet slope distance (600 feet including both sides of the stream channel).

Depending on the topography, the RHCA could be smaller or larger than the wild and scenic river corridor, if designated.

Cooperative management with USFS in adjacent parcels would be required to ensure protection of fisheries ORVs.

An ACEC nomination is being considered for this area and could provide necessary protection depending on management measures developed.

BLM and USFS also manage this riparian corridor according to the requirements of the ESA for the protection of bull trout and bull trout habitat.

A portion of this area is within the Grandmother Mountain WSA. Interim management affords limited protection of fisheries ORVs in the areas within the WSA. These management measures, although effective, are only interim and could be removed by congressional action.

7. Historical or existing rights that could be adversely affected with designation:

   The Coeur d'Alene Tribe may have historical rights for fishing, hunting, and gathering. Little Lost Lake Creek may also hold spiritual significance to the tribe. The right of the Coeur d'Alene Tribe to alter the stream by installing dams or by channelizing is unknown.

8. Other:

   No other major issues or concerns regarding suitability of this segment have been identified in the land use planning process.

Segment 5: Lund Creek

1. Characteristics that do or do not make the river a worthy addition to the National System:

   This segment contains outstandingly remarkable fisheries and botanic values. Fisheries ORVs are related to spawning and rearing habitat for bull trout and westslope cutthroat trout. Lund Creek provides the best cold water refugia within this upper section of the Little North Fork Clearwater River. Botanic ORVs are related to the unique plant assemblages in this area. These values are dependent upon the free flowing nature of the river segment.

The segment is only accessible by foot; there are no maintained trails along this segment.

The segment has no water quality issues.

2. The status of land and mineral ownership, use in the area, and associated or incompatible uses:

The segment is 6.2 kilometers (3.88 miles) long and is entirely on federally managed lands. BLM manages lands along 5.0 kilometers (3.09 miles or 80%) of the segment, and USFS manages lands along the remaining 20 percent of the segment (See Map #71 in Volume III of the Draft Coeur d'Alene RMP/EIS). The study corridor included all lands within 0.4 kilometer (0.25 mile) of the river.

The entire BLM-managed portion of the study corridor is within the Lund Creek RNA/ACEC, which includes management measures to prevent any destructive activities. No vegetative manipulation, including timber harvest, or vehicle use is permitted.

A query of BLM's LR2000 database (accessed January 2005) revealed no active mining claims on the identified BLM lands or adjacent USFS lands. A review of the Mines and Prospects of the Wallace Quadrangle, Idaho indicated no historical activity on the identified BLM lands and one very old prospect (1911) for gold, silver, copper, and lead within 1.6 kilometer (one mile) of the headwaters. Other prospects in the area for metals, mica, feldspar, and sand and gravel were all more than 1.6 kilometer (one mile) away. This information agrees with the mineral potential classification assigned to this region in the Mineral Occurrence and Development Potential Report, Coeur d'Alene Field Office Planning Area (BLM 2005). Current information suggests it is a hardrock area with low potential for all minerals.

Public land status in this area is unencumbered; there are no existing leases, ROWs, utility corridors or withdrawals associated with these lands.

3. Reasonably foreseeable potential uses of the land and related waters that would be enhanced, foreclosed, or curtailed if the area were included in the National System, and values that would be foreclosed or diminished if the area were not designated:

If the segment were designated as a WSR, future timber harvests and construction of roads would not be permitted within the designated corridor. This would result in a specific riparian no harvest/activity buffer zone incorporated into any future timber sales in this area. Such restrictions would be consistent with current management measures for the Lund Creek RNA/ACEC. WSR designation would complement the protection given to the natural features and ecological diversity by the existing Lund Creek RNA/ACEC. No vegetation manipulation or vehicle use is permitted within this RNA/ACEC.

Classification as a wild river would include withdrawal of the area from mineral entry.

Lund Creek is used very little for recreation except for primitive hunting opportunities. Consequently, designation is not likely to affect recreational use of the area.

4. Federal, state, tribal, local, public, or other interest in designating or not designating the river:

   At this time, no specific federal, state, tribal, local, or public entity has expressed interest in this segment of the Lund Creek regarding wild and scenic designation. BLM anticipates comments on wild and scenic river designation from interested parties to be received during the Draft RMP comment period.

   Several different entities would be interested in whether this segment is designated or not designated for inclusion in the National Wild and Scenic Rivers System. The primary entity would be the USFS. The USFS manages lands along the lower section between BLM lands and the confluence with the Little North Fork Clearwater River.

   Other entities potentially interested include the Coeur d'Alene Tribe, Idaho Fish and Game, Shoshone County, local fishing clubs, outfitters, and other authorized users.

5. Estimated cost of acquiring necessary lands, interests in lands, and administering the area if designated:

   All lands along the river segment are federally managed, so no land acquisition would be required. Coordination with USFS on designation and management would be necessary to protect ORVs.

6. The ability of the agency to manage and protect the river area or segment as a Wild and Scenic River, or other means to protect the identified values other than Wild and Scenic River designation:

   Protection of fisheries ORVs on BLM lands would likely be accomplished through BLM's implementation of the INFISH standards and guidelines for the protection of Riparian Habitat Conservation Areas (RHCA). RHCAs are portions of watersheds where riparian-dependent resources receive primary emphasis, and management activities are subject to specific standards and guidelines.

   For "fish-bearing streams," Interim RHCAs consist of the stream and the area on either side of the stream extending from the edges of the active stream channel to the greater of:

   - the top of the inner gorge or to the outer edges of the 100-year floodplain, or
   - to the outer edges of riparian vegetation, or

- to a distance equal to the height of the two site potential trees or 300 feet slope distance (600 feet including both sides of the stream channel).

Depending on the topography, the RHCA could be smaller or larger than the wild and scenic river corridor, if designated.

Cooperative management with USFS in adjacent parcels would be required to ensure protection of fisheries and botanic ORVs.

BLM and USFS also manage this riparian corridor according to the requirements of the ESA for the protection of bull trout and bull trout habitat.

Current RNA/ACEC designation provides protection of riparian habitat for the majority of the segment. The lower mile currently outside the RNA/ACEC has been nominated for designation as an ACEC and is being evaluated. Interim management measures for the WSA provide additional protection.

7. Historical or existing rights that could be adversely affected with designation:

   The Coeur d'Alene Tribe may have historical rights for fishing, hunting, and gathering. Lund Creek may also hold spiritual significance to the tribe. The right of the Coeur d'Alene Tribe to alter the stream by installing dams or by channelizing is unknown.

8. Other:

   No other major issues or concerns regarding suitability of this segment have been identified in the land use planning process.

2.4 Suitability Determination Summary

Four of the five eligible segments were determined to be suitable for inclusion in the National System. Below is a summary of each of the five segments.

2.4.1 Segment 1: Kootenai River

This segment contains outstandingly remarkable values for fisheries, wildlife, and botanics. Within the BLM-managed portions of this segment, there is high quality spawning and/or rearing habitat for Kootenai sturgeon, bull trout, burbot, and westslope cutthroat trout. Bald eagles nest and forage along the Kootenai River from the Montana state line downstream to Bonner's Ferry. Botanic ORVs are related to the unique botanical values within the Hideaway Islands RNA/ACEC. The segment would meet classification criteria as Recreational because of the presence of a railroad parallel to the shoreline.

Designation of this segment would result in several management challenges because of the scattered land pattern and controlled flows. Land uses on privately owned parcels adjacent to the river could adversely affect fisheries habitats downstream in the BLM-managed portions. Activities such as timber harvest and sand/gravel extraction could

increase sedimentation and could result in increased water temperatures due to decreased riparian shade, which would affect fish habitats in BLM-managed segments. Additionally, water flow management from Libby Dam is key to protecting the fisheries and wildlife values. Managing flows is not under the jurisdiction of BLM. Due to these management challenges, this segment has been determined **not suitable** for designation as a **Recreational** river within the National System.

Although this segment contains ORVs worthy of protection, and designation would result in minimal changes to management on the BLM-managed parcels, the determination that this segment is unsuitable for designation at this time is based on the following direction from the updated BLM guidance 8351.06B and 8351.33A:

8351.06B—"In cases where a particular river segment is predominantly non-Federal in ownership and contains interspersed BLM-administered lands, BLM shall evaluate only its segment as to eligibility and defer to the State or to the private landowners' discretion as to their determination of eligibility.

8351.33A—A.2, Status of land ownership, minerals, use in the area, including the amount of private land involved, and associated or incompatible uses. Jurisdictional consideration (administrative role and/or presence) must be taken into account to the extent that management would be affected. In situations where there is limited public lands (shoreline and adjacent lands) administered by the BLM within an identified river study area, it may be difficult to ensure those identified outstandingly remarkable values could be properly maintained and afforded adequate management protection over time. Accordingly, for those situations where the BLM is unable to protect or maintain any identified ORV, or through other mechanisms (existing or potential), river segments may be determined suitable only if the entity with land use planning responsibility supports the finding and commits to assisting the BLM in protecting the identified river values."

The final suitability determination relies on the judgment of BLM resource experts. The initial "not suitable" determination is based primarily on the assumption that potential land use activities (i.e., timber harvest, sand/gravel extraction, and dam operations) on private and state land parcels upstream of BLM parcels could adversely affect fisheries habitat in the BLM-managed sections.

2.4.2 Segment 2: Little North Fork Clearwater River

This segment contains outstandingly remarkable fisheries values. These values are related to the high quality spawning and rearing habitat for bull trout and westslope cutthroat trout. BLM manages lands along 4.1 kilometers (2.56 miles) of this 5.8 kilometers (3.61 mile) segment, with USFS managing the remaining lands. The segment meets classification criteria for Wild in the upstream portion from the western USFS boundary to the headwaters at Fish Lake. The downstream portion from the eastern USFS boundary to shortly below the confluence with Lost Lake Creek meets the criteria for Recreational due to a dirt road that parallels this segment. Managing these sections for protection of fisheries ORVs would result in minimal changes to existing

management but would provide an additional layer of protection for this river segment. Coordination with USFS would be required to ensure consistent management. However, the USFS implementation of INFISH standards and guidelines, and ESA requirements for lands along this segment, would prevent USFS land use activities from adversely affecting fish habitats in BLM-managed segments downstream. This segment has been determined **suitable** for designation as **Wild (upstream)** and **Recreational (downstream)** within the National System.

2.4.3 Segment 3: Lost Lake Creek

This segment contains ORVs for fisheries related to the high quality spawning and rearing habitat for bull trout and westslope cutthroat trout. Land status and ownership along this 5.5 kilometers (3.43 mile) segment is scattered. Beginning at Lost Lake and proceeding downstream, land status is USFS, BLM, USFS, private, USFS, private, and ending on BLM lands at the confluence with the Little North Fork Clearwater River. This creates some management challenges. On federally managed lands (USFS and BLM), INFISH standards and guidelines and ESA requirements should protect fish habitats and the necessary riparian buffer. The upstream portion on BLM-managed lands would meet the classification criteria for a wild river. The downstream portion, which includes the confluence with the Little North Fork Clearwater River, would meet classification criteria for a scenic river. Designation of this segment would result in minimal changes to BLM management. Some monitoring and potential modification of trail uses and maintenance may be required. Land uses on private parcels (controlled by a timber company) could adversely affect fish habitats in the downstream BLM-managed portion. Increased sedimentation from runoff and decreased riparian habitat could result from timber harvest practices. Timber harvest on these parcels would follow Idaho state forest practices, but this would not eliminate the potential for adverse impacts. BLM would pursue acquisition of land and/or easements, on a willing seller basis, within the riparian corridor for these parcels. This segment has been determined **suitable** for designation as a **Wild (upstream portion)** and **Scenic (downstream portion)** river within the National System.

This suitability determination is based on the assumption that timber harvest and other activities on the private parcels would not significantly affect fish habitats. If this assumption is not correct, then BLM should consider only finding the upstream portion suitable for designation.

2.4.4 Segment 4: Little Lost Lake Creek

This segment contains fisheries ORVs related to its high quality spawning and rearing habitat for bull trout and westslope cutthroat trout. All lands immediately adjacent to the segment are federally managed, with the majority (69%) administered by BLM. This segment would meet classification criteria as a wild river. Designating this segment would result in minimal changes to existing management but would provide protections compatible with the WSA designation and the ESA. OHV use of the trail paralleling the river would be monitored for effects to fish habitat in the segment. Future timber sales would be subject to riparian exclusion zones to prevent increased sedimentation. The USFS manages the land downstream of the BLM portion. Land use activities on

USFS lands would have minimal affect on BLM-managed sections. The USFS implementation of INFISH standards and guidelines, and ESA requirements for lands along this segment, would prevent USFS land use activities from adversely affecting fish habitats. The only potential management challenges for this segment would arise from land use activities on privately owned lands within the watershed. Private parcels are not located immediately adjacent to Little Lost Lake Creek but are within 0.4 kilometer (0.25 mile) of the river. Consequently, activities such as timber harvest could result in increased sedimentation in the river. This adverse affect is not expected to occur do to the protections afforded the segment from WSA designation and the requirements of the ESA. This segment has been determined **suitable** for designation as a **Wild** river within the National System.

2.4.5 Segment 5: Lund Creek

This segment contains fisheries and botanic ORVs. Lund Creek provides the best cold water refugia on BLM land in the upper Little North Fork Clearwater River watershed for bull trout and westslope cutthroat trout. Botanic values are related to the unique plant assemblages associated with the creek. BLM manages the majority of lands along the creek (80%). USFS manages land along the downstream 20 percent of the creek. Access to this segment is limited to foot traffic, with no maintained trails. This segment would meet classification criteria as Wild. Designating this segment would result in minimal changes to existing management but would provide layer of protection for the fisheries and botanic values compatible with the protection already afforded by the RNA/ACEC designation, WSA designation and requirements of the ESA. This segment has been determined to be **suitable** for designation as a **Wild** river within the National System.

TAB A
ELIGIBILITY CRITERIA

A.1 INTRODUCTION

For the purpose of classification, a river area may be divided into segments. For example, changes in river character, such as the presence of dams and reservoirs, significant changes in types or amounts of development, significant changes in physiographic character, tributaries, or features, and/or significant changes in land status should be considered in identifying river segments for evaluation. Management strategies necessary to administer the entire river area should also be taken into account. As such, excessive segmentation should be avoided. Each segment, considered as a whole, needs to conform to either the Wild, Scenic, or Recreational classification. There are no specific requirements for segment length. Congress has designated a segment to be as short as 6.4 kilometers (four miles). A river segment is of sufficient length if a specific outstandingly remarkable value or values can be protected (a factor in the suitability determination, not eligibility determination), should the segment be designated. An entire stream could be one segment.

Each identified river segment in the RMP planning area must be evaluated to determine whether or not it is eligible for inclusion in the National System. To be eligible, a river segment must be free-flowing and must possess at least one outstandingly remarkable value. Free-flowing means "existing or flowing in a natural condition without impoundment, diversion, straightening, riprapping, or other modification of the water." Please note the following:

- A river below a dam or impoundment is still eligible;
- A river need not be navigable by watercraft in order to be eligible; and
- There are no specific requirements concerning the flow of an eligible river segment. Flows are sufficient if they sustain or complement the outstandingly remarkable values for which the segment would be designated. As such, intermittent and ephemeral streams are eligible.

A.2 OUTSTANDINGLY REMARKABLE VALUES

The determination of whether a river area contains outstandingly remarkable values is a professional judgment and needs to be documented. In order to be considered as outstandingly remarkable, a river-related value must be a unique, rare, or exemplary feature that is significant at a comparative regional or national scale. While the spectrum of resources that may be considered is broad, all values should be directly river-related; that is, they should have the following characteristics:

- Be located in the river or on its immediate shore lands (for the purposes of this study, the preliminary boundary is 0.4 kilometer (0.25 mile) on either side of the river);
- Contribute substantially to the functioning of the river ecosystem; or
- Owe their location or existence to the presence of the river.

The following are general guidelines for the outstandingly remarkable values for which river segments can be eligible. Only one such value is needed for eligibility.

A.2.1 Scenic

The landscape elements of landform, vegetation, water, color, and related factors result in notable or exemplary visual features or attractions. When analyzing scenic values, additional factors, such as seasonal variations in vegetation, scale of cultural modifications, and the length of time negative intrusions are viewed, may be considered. Scenery and visual attractions may be highly diverse over most of the river or river segment.

A.2.2 Recreational

Recreational opportunities are or have the potential to be popular enough to attract visitors from throughout or beyond the region of comparison or are unique or rare within the region. Visitors are willing to travel long distances to use the river resources for recreation. River-related opportunities include, but are not limited to, sightseeing, wildlife observation, camping, photography, hiking, fishing, and boating.

- Interpretive opportunities may be exceptional and may attract or have the potential to attract visitors from outside the region of comparison.
- The river may provide or have the potential to provide settings for national or regional use or competitive events.

A.2.3 Geological

The river, or the area within the river corridor, contains one or more examples of a geologic feature, process, or phenomenon that are unique or rare within the region of comparison. The features may be in an unusually active stage of development, represent a textbook example, or represent a unique or rare combination of geologic features (erosional, volcanic, glacial, or other geologic structures).

A.2.4 Fish

Fish values may be judged on the relative merits of either fish populations or habitat or a combination of the following river-related conditions:

- *Populations.* The river is nationally or regionally one of the top producers of resident, indigenous, or anadromous fish species. Of particular significance may be the presence of wild or unique stocks or populations of state- or US-listed or candidate threatened and endangered species.
- *Habitat.* The river provides exceptionally high quality habitat for fish species indigenous to the region. Of particular significance is habitat for state- or US-listed or candidate threatened and endangered species.

A.2.5 Wildlife

Wildlife values may be judged on the relative merits of either wildlife populations or habitat or on a combination of the following conditions:

- *Populations.* The river or area within the river corridor contains nationally or regionally important populations of resident or indigenous wildlife species depending on the river environment. Of particular significance may be species considered to be unique or populations of state- or US-listed or candidate threatened and endangered species.
- *Habitat.* The river or area within the river corridor provides exceptionally high quality habitat for wildlife of national or regional significance or may provide unique habitat or a critical link in habitat conditions for state- or US-listed or candidate threatened and endangered species. Contiguous habitat conditions are such that the biological needs of the species are met.

A.2.6 Cultural

The river or area within the river corridor contains a site or sites where there is evidence of occupation or use by Native Americans. Sites must be rare or must have unusual characteristics or exceptional human interest values. Sites may have national or regional importance for interpreting prehistory; may be rare; may represent an area where culture or a cultural period was first identified and described; may have been used concurrently by two or more cultural groups; or may have been used by cultural groups for rare or sacred purposes.

A.2.7 Historic

The river or area within the river corridor contains a site or sites or feature or features associated with a significant event, an important person, or a cultural activity of the past that was rare or unusual in the region. A historic site or feature in most cases is 50 years old or older. Sites or features listed on or eligible for inclusion on the National Register of Historic Places may be of particular significance.

A.2.8 Other Similar Values

While no specific evaluation guidelines have been developed for the other similar values category, additional values deemed relevant to the eligibility of the river segment should

be considered in a manner consistent with the foregoing guidance, including, but not limited to, hydrologic, ecologic/biologic diversity, paleontologic, botanic, and scientific study opportunities.

TAB B
RIVER SEGMENTS FROM INITIAL IDENTIFICATION EFFORTS

Table B-1 lists the Planning Area river and stream segments considered during initial identification efforts for the Wild and Scenic Rivers study process.

Table B-1
Wild and Scenic River Eligibility Review Summary

Stream Name	Free Flowing	Scenic	Rec.	Geology	Fish	Wildlife	Cultural	Historic	Other	Eligible	Remarks
Ahrs Creek	YES									NO	
Ahrs Gulch	YES									NO	
Alder Creek	YES									NO	
Alder Gulch	YES									NO	
Amy Gulch	YES									NO	
Antelope Creek	YES									NO	
Argentine Creek	YES									NO	
Baldy Creek	YES									NO	
Beaver Creek	YES									NO	
Big Creek	YES									NO	
Black Prince Creek	YES									NO	
Blackcloud Creek	YES									NO	
Blackjack Creek	YES									NO	
Blackwell Canals	NO									NO	Man-made canals
Blue Creek	YES									NO	
Blue Eagle Creek	YES									NO	
Boulder Creek	YES									NO	
Butte Gulch	YES									NO	
Calusa Creek	YES									NO	
Carbon Creek	YES									NO	
Caribou Creek	YES									NO	
Cascade Creek	YES									NO	
Clark Fork River	YES									NO	
Coeur d'Alene River	YES									NO	
Cougar Gulch	YES									NO	
Cranky Gulch	YES									NO	
Crater Creek	YES									NO	
Daly Gulch	YES									NO	
Deadman Gulch	YES									NO	
Delaney Creek	YES									NO	
Denver Creek	YES									NO	
Dexter Gulch	YES									NO	
Dobson Gulch	YES									NO	
Douglas Creek	YES									NO	
Dry Butte Gulch	YES									NO	
Dry Gulch	YES									NO	
Duplex Creek	YES									NO	

Table B-1
Wild and Scenic River Eligibility Review Summary *(continued)*

Stream Name	Free Flowing	Scenic	Rec.	Geology	Fish	Wildlife	Cultural	Historic	Other	Eligible	Remarks
East Fork Nine Mile Cr.	YES									NO	
East Fork Pine Creek	YES									NO	
Elk Creek	YES									NO	
Evans Creek	YES									NO	
Experimental Draw	YES									NO	
Falls Creek	YES									NO	
Farnham Creek	YES									NO	
Floodwood Creek	YES									NO	
Fortynine Meadows Cr.	YES									NO	
Freeman Creek	YES									NO	
Freezeout Creek	YES									NO	
Gentle Annie Gulch	YES									NO	
Gilbert Creek	YES									NO	
Gold Hunter Gulch	YES									NO	
Gold Run	YES									NO	
Gorge Gulch	YES									NO	
Government Gulch	YES									NO	
Grader Gulch	YES									NO	
Grouse Creek	YES									NO	
Grouse Gulch	YES									NO	
Harvey Creek	YES									NO	
Hauck Gulch	YES									NO	
Highland Creek	YES									NO	
Hord Gulch	YES									NO	
Hunter Creek	YES									NO	
Idaho Gulch	YES									NO	
Jackass Creek	YES									NO	
Katka Creek	YES									NO	
Klondike Gulch	YES									NO	
Kootenai River	YES				YES	YES		Botanic		YES	Also Forest Service lands
Lake Creek	YES									NO	
Latour Creek	YES									NO	
Little Lost Lake Creek	YES				YES					YES	Also Forest Service lands
Little North Fork Clearwater River	YES				YES					YES	Also Forest Service lands

Table B-1
Wild and Scenic River Eligibility Review Summary *(continued)*

Stream Name	Free Flowing	Scenic	Rec.	Geology	Fish	Wildlife	Cultural	Historic	Other	Eligible	Remarks
Little Pine Creek	YES									NO	
Little Sand Creek	YES									NO	
Little Terror Gulch	YES									NO	
Lost Lake Creek	YES				YES					YES	Also Forest Service lands
Lund Creek	YES				YES				Botanic	YES	Also Forest Service lands
Lyle Creek	YES									NO	
Lynch Gulch	YES									NO	
Marble Creek	YES									NO	
McFarren Gulch	YES									NO	
McKinley Gulch	YES									NO	
McLaren Gulch	YES									NO	
McQuade Gulch	YES									NO	
Meyer Gulch	YES									NO	
Middle Fork Pine Creek	YES									NO	
Mill Creek	YES									NO	
Mineral Creek	YES									NO	
Missoula Gulch	YES									NO	
Nabob Creek	YES									NO	
Ninemile Creek	YES									NO	
North Fork Glover Cr.	YES									NO	
Ophir Gulch	YES									NO	
Parker Creek	YES									NO	
Pend Oreille River	YES									NO	
Pinchot Creek	YES									NO	
Pine Creek	YES									NO	
Placer Creek	YES									NO	
Polaris Gulch	YES									NO	
Prichard Creek	YES									NO	
Prospect Gulch	YES									NO	
Red Cloud Creek	YES									NO	
Red Oak Gulch	YES									NO	
Reeder Gulch	YES									NO	
Reeds Gulch	YES									NO	
Revenue Gulch	YES									NO	
Rochat Creek	YES									NO	
Rock Creek	YES									NO	

Table B-1
Wild and Scenic River Eligibility Review Summary *(continued)*

Stream Name	Free Flowing	Scenic	Rec.	Geology	Fish	Wildlife	Cultural	Historic	Other	Eligible	Remarks
Ross Gulch	**YES**									NO	
Ruddy Gulch	**YES**									NO	
Saint Joe Creek	**YES**									NO	
Sawmill Gulch	**YES**									NO	
Scott Creek	**YES**									NO	
Shields Gulch	**YES**									NO	
Slaughterhouse Gulch	**YES**									NO	
Sourdough Gulch	**YES**									NO	
South Fork Coeur d'Alene River	**YES**									NO	
Spokane River	NO									NO	**Above Post Falls Dam**
St. Joe River	**YES**										**Previously studied**
Stinson Creek	**YES**									NO	
Street Creek	**YES**									NO	
Sunnyside Creek	**YES**									NO	
Syringa Creek	**YES**									NO	
Terror Gulch	**YES**									NO	
Tiger Gulch	**YES**									NO	
Trapper Creek	**YES**									NO	
Trowbridge Gulch	**YES**									NO	
Twin Spring Creek	**YES**									NO	
Watson Gulch	**YES**									NO	
Wesp Gulch	**YES**									NO	
West Fork Big Creek	**YES**									NO	
West Fork Elk Creek	**YES**									NO	
West Fork McFarren Gulch	**YES**									NO	
West Fork Pine Creek	**YES**									NO	
West Fork Placer Creek	**YES**									NO	

TAB C
CLASSIFICATION CRITERIA FOR WILD, SCENIC, AND RECREATIONAL RIVER AREAS

Table C-1 lists the classification criteria for wild, scenic, and recreational river areas.

Table C-1
Classification Criteria for Wild, Scenic, and Recreational River Areas

Attribute	Wild	Scenic	Recreational
Water Resources Development (impoundments, diversions, etc.)	Free of impoundment.	Free of impoundment.	Some existing impoundment or diversion. The existence of low dams, diversions, riprap, or other modifications of the waterway is acceptable, provided the waterway remains generally natural and riverine in appearance.
Shoreline Development	Essentially primitive. Little or no evidence of human activity. The presence of a few inconspicuous structures, particularly those of historic or cultural value, is acceptable. A limited amount of domestic livestock grazing or hay production is acceptable. Little or no evidence of past timber harvest. No ongoing timber harvest.	Largely primitive and undeveloped. No substantial evidence of human activity. The presence of small communities or dispersed dwellings or farm structures is acceptable. The presence of grazing, hay production, or row crops is acceptable. Evidence of past or ongoing timber harvest is acceptable, provided the forest appears natural from the riverbank.	Some development. Substantial evidence of human activity. The presence of extensive residential development and a few commercial structures is acceptable. Lands may have been developed for the full range of agricultural and forestry uses. May show evidence of past and ongoing timber harvest.

Table C-1
Classification Criteria for Wild, Scenic, and Recreational River Areas *(continued)*

Attribute	Wild	Scenic	Recreational
Accessibility	Generally inaccessible except by trail. No roads, railroads, or other provision for vehicular travel within the river area. A few existing roads leading to the boundary of the river area is acceptable.	Accessible in places by road. Roads may occasionally reach or bridge the river. The existence of short stretches of conspicuous or longer stretches of inconspicuous roads or railroads is acceptable.	Readily accessible by road or railroad. The existence of parallel roads or railroads on one or both banks, as well as bridge crossings and other river access points, including fords, is acceptable.
Water Quality	Meets or exceeds federal criteria or federally approved state standards for aesthetics, for propagation of fish and wildlife normally adapted to the habitat of the river, and for primary contact recreation (swimming), except where exceeded by natural conditions.	No criteria prescribed by the Wild and Scenic Rivers Act. The Federal Water Pollution Control Act Amendments of 1972 have made it a national goal that all waters of the US be made fishable and swimmable. Therefore, rivers will not be precluded from scenic or recreational classification because of poor water quality at the time of their study, provided a water quality improvement plan exists or is being developed in compliance with applicable federal and state laws.	

Source: Federal Register. National Wild and Scenic Rivers System; Final Revised Guidelines for Eligibility, Classification, and Management of River Areas. Section 1(3), Vol. 47, No. 173, page 39461. September 7, 1982.

TAB D
INTERIM PROTECTION FOR CANDIDATE WILD AND SCENIC RIVERS

Table D-1 lists the interim protections for candidate wild and scenic rivers, discussing issues, and if each issue is eligible or suitable for protections.

Table D-1
Interim Protection for Candidate Wild and Scenic Rivers

Wild and Scenic Rivers Act, Section 5(d)(1)[1]

Issue/Action	Eligible[2]	Suitable
Study Boundary	Minimum of 0.4 kilometer (0.25 mile) from ordinary high-water mark. Boundary may include adjacent areas needed to protect identified values.	Minimum of 0.4 kilometer (0.25 mile) from ordinary high-water mark. Boundary may include adjacent areas needed to protect identified values.
Preliminary Classification	Section 2(b): 3 classes: Wild, Scenic, Recreational, defined by statute. Criteria for classification described in Interagency Guidelines. Manage at preliminary classification.	Section 2(b): 3 classes: Wild, Scenic, Recreational, defined by statute. Criteria for classification described in Interagency Guidelines. Manage at preliminary classification.
Study Report Review Procedures		Notice of study report/draft EA[3] published in Federal Register. Comments/response from federal, state, and local agencies and the public included in the study report/final EA[4] transmitted to the President and Congress.

Table D-1
Interim Protection for Candidate Wild and Scenic Rivers *(continued)*

	Wild and Scenic Rivers Act, Section 5(d)(1)[1]	
Issue/Action	**Eligible[2]**	**Suitable**
Private Land *Administration *Acquisition	Affect private land uses through voluntary partnership with state/local governments and landowners. No regulatory authority. No ability to acquire interest in land under the act's authority prior to designation.	Affect private land uses through voluntary partnership with state/local governments and landowners. No regulatory authority. No ability to acquire interest in land under the act's authority prior to designation. Typically an evaluation of the adequacy of local zoning and land use controls is a component of suitability determination[5].
Water Resources Project	River's free-flowing condition protected to the extent of other agency authorities; not protected under the act.	River's free-flowing condition protected to the extent of other agency authorities; not protected under the act.
Land Disposition	Agency discretion to retain lands within river corridor in federal ownership.	Agency discretion to retain lands within river corridor in federal ownership.
Mining and Mineral Leasing	Protect free flow, water quality, and outstandingly remarkable values through other agency authorities.	Protect free flow, water quality, and outstandingly remarkable values through other agency authorities.
Actions of Other Agencies	Affect actions of other agencies through voluntary partnership.	Affect actions of other agencies through voluntary partnership.
Protect Outstandingly Remarkable Values	No regulatory authority conferred by the act; agency protects through other authorities. Section 11(b) 1: Limited financial or other assistance to encourage participation in the acquisition, protection, and management of river resources[6].	No regulatory authority conferred by the act; agency protects through other authorities. Section 11(b) 1: Limited financial or other assistance to encourage participation in the acquisition, protection, and management of river resources[6].

1 Agency-identified study rivers as directed by Section 5(d)(1) of the act.

2 A number of sources are available for identifying rivers under Section 5(d)(1). Under a Presidential Directive issued in 1979, each federal agency, as part of its normal planning and environmental review processes, is required to avoid or mitigate adverse effects on rivers in the National Rivers Inventory.

3 Draft environmental assessment

4 Final environmental assessment

5 For an agency-identified study river that includes private lands, there is often the need to evaluate existing state and local land use controls and, if necessary, to assess the willingness of state and local governments to protect river values.

6 Section 11(b)1 authorizes the Secretary of the Interior and Secretary of Agriculture or the head of any other federal agency to provide for "limited financial or other assistance to encourage participation in the acquisition, protection, and management of river resources." This authority "applies within or outside a federally administered area and applies to rivers which are components of the National Wild and Scenic Rivers System and to other rivers." The recipients of federal assistance include states or their political subdivisions, landowners, private organizations, or individuals. Some examples of assistance under this section include, but are not limited to, riparian restoration, riparian fencing to protect water quality and riparian vegetation, or vegetative screening to enhance scenery/recreation experience.

APPENDIX K – PUBLIC COMMENTS AND RESPONSES

PUBLIC COMMENTS AND RESPONSES

The Coeur d'Alene Draft RMP/EIS was circulated for public review and comment from January 13, 2006, to April 14, 2006. The process of distributing the draft document and receiving public comments is described in Chapter 5 of the EIS.

In accordance with NEPA regulations (40 CFR 1503.4), the Final EIS provides responses to comments on the Draft RMP/EIS. In compliance with these regulations, this appendix includes a list of agencies, organizations, and individuals that commented on the Draft RMP/EIS, copies of their comments, and BLM's responses to those comments. The BLM reviewed and considered all comments and determined whether or not the comments warranted further analysis or changes to the Draft RMP/EIS. While the BLM greatly appreciates the participation of all those who commented, not all comments required further analysis or changes to the Draft RMP/EIS. The BLM noted in the individual responses when further analysis or changes were made.

Comments were broadly grouped according to whether the author belonged to an agency (A) or an organization (O) or whether he or she was writing as a member of the public at large (P). Within each of these broad categories, the commentors were grouped alphabetically then assigned a number sequentially. This resulted in the commentor code, which is listed in Table 1, along with the name of the commentor and the page number(s) of the comment response table (Table 3) on which their comments appear. Please refer to Table 3 to see all comments and BLM responses.

Table 1
Index of Commentors

Commentor Code	Commentor	Page Number
A1	Benewah County Emergency Management, Janet Samford	K-7
A2	Coeur d'Alene Tribe, Tiffany Allgood	K-7 – K-10
A3	US Environmental Protection Agency (USEPA), Region 10 Christine B. Reichgott	K-10 – K-12
A4	State of Idaho, Department of Environmental Quality, June Berquist	K-12 – K-13
A5	Idaho Department of Fish and Game, Charles E. "Chip" Corsi	K-13 – K-15
O1	Back Country ATV Association, Inc., Richard L. Lambert	K-19
O2	Coeur d'Alene Audubon, Lisa Hardy	K-19
O3	Capital Trail Vehicle Association, Don Gordon, Bob Mullenix, Ken Salo, George Wirt	K-20 – K-77
O4	Friends of the Clearwater, Gary Macfarlane; The Lands Council, Mike Peterson; The Ecology Center, Jeff Juel; Alliance for the Wild Rockies; Selkirk Conservation Alliance, Lisa Sedler	K-77 – K-90
O5	Idaho Conservation League and The Wilderness Society	K-90 – K-107
O6	The Idaho Native Plant Society, Kinnikinnick Chapter, Philip Hough	K-107 – K-116
O7	Idaho Rivers United, Kevin Lewis	K-117
O8	Kootenai Environmental Alliance, Mike Mihelich	K-117 – K-118
O9	North Idaho Trail Blazers, Hans Archer	K-118
O10	PacifiCorp, Curt Meyers	K-119 – K-120
P1	George and Frances Alderson	K-123 – K-124
P2	Paul J. Allan	K-123 – K-124
P3	Richard Artley	K-125
P4	Richard Artley	K-125 – K-126
P5	Louise E. Ashmun	K-126
P6	Chad BaconRind	K-127

Commentor Code	Commentor	Page Number
P7	Joel Barker	K-127
P8	Joseph Bayley	K-128
P9	Lucas D. Bell	K-128
P10	Fred W. Brackebush	K-129
P11	Robert S. Briggs	K-129
P12	Cedar Brinkley	K-130
P13	Bill Caldwell	K-130
P14	Brad Daffin and Sarah Campbell	K-131
P15	Jodi Degenstein	K-131
P16	Forrest Dexter	K-132 – K-133
P17	Dave Carl Graham	K-133 – K-134
P18	Ron Grey	K-134
P19	Brenda Guettler	K-135
P20	Steve Haight	K-135
P21	David Hall	K-136
P22	Chris Hauer	K-136
P23	Neal Hill	K-137
P24	Debra Houston	K-137
P25	Tom Ingram	K-138
P26	Holly Jaleski	K-138
P27	Pam Katus	K-139
P28	Ray Katus	K-139
P29	John Kletke	K-140
P30	Roger Korus	K-140
P31	Russell J. Leahy	K-141
P32	James McGovern	K-141
P33	Lewis E. Miller	K-142
P34	Jim Nelson	K-142
P35	Nathan Opsal	K-143
P36	Mike Pearson	K-144
P37	Al Poplawsky and Diane Prorak	K-144
P38	Fred Rabe	K-145
P39	David Gray Remington	K-145
P40	Melissa Sanborn	K-146
P41	Ted L. Scherff	K-146
P42	David Serwat	K-147
P43	Gretchen Stewart	K-147
P44	Andy Watson	K-148
P45	Susan Westervelt	K-148
P46	Crystal Westphal	K-149
P47	Paul Westphal	K-149
P48	Bill and Barb White	K-150
P49	Bill White	K-150
P50	Dick Williams	K-151
P51	Jerry L. Willis	K-151
P52	Wayne C. Willis	K-152
P53	Robin Woods	K-152 – K-153

Table 2 is a list of the topics that were addressed in the public comments and indicates the specific comments in which these topics were discussed. The comment numbers in this table represent the commentor code from Table 1, followed by the individual comment number. Individual comments and responses appear in Table 3 in numeric sequence, starting on the page number specified in Table 1 for the commentor.

Table 2
Index of Comment Topics

Topic	Comment Number
Abandoned Mine Lands	O5-83, O5-84
Air Quality	A2-4, A3-1, A3-4
Areas of Critical Environmental Concern	O4-14, O4-15, O4-39, O5-5, O5-36, O5-61, O5-62, O5-65, O6-21, O6-35, O6-36, O6-37, O6-38, O6-39, O6-40, O6-41, O6-44, O6-50, O6-51, O6-54, O6-61, O8-6, P39-3
Cultural Resources	A2-8, A2-9, A2-13, A2-14, A2-15, A2-16, A2-17, A2-20, A2-22, A2-23, A2-24, A2-25, A2-26, A2-27, A2-28, A2-29, A2-31, O3-250, O5-47
Fire Management	A1-1, A3-4, A5-9, O3-160, O3-173, O4-3, O4-7, O4-8, O4-9, O4-10, O4-11, O4-12, O5-5, O5-33, O5-34, O5-35, O5-36, O5-37, O6-55, P10-3
Fish and Wildlife	A2-15, A3-2, A3-3, A5-1, A5-2, A5-3, A5-4, A5-5 A5-6, A5-7, A5-8, A5-9, A5-10, A5-11, A5-12, A5-13, A5-14, A5-15, A5-16, A5-17, O2-1, O3-20, O3-21, O3-174, O3-177, O3-178, O3-179, O3-180, O3-181, O3-182, O3-185, O3-186, O3-188, O3-189, O3-223, O3-290, O3-315, O4-20, O4-22, O4-23, O4-24, O4-26, O4-27, O4-28, O5-38, O5-39, O5-40, O5-41, O5-44 , O5-46, O5-75, O5-77, O5-78, O10-11, P29-3
Forest Products	A5-16, O3-18, O3-19, O3-267, O3-316, O3-317, O4-10, O4-13, O4-14, O4-15, O5-27, O5-28, O5-29, O5-30, O6-1, O6-3, O6-18, O6-19, O6-20, O6-46, P26-1, P26-2
Forest Vegetation	O2-3, O3-20, O3-174, O3-178, O3-181, O3-185, O3-186, O3-188, O3-189, O3-290, O3-315, O4-3, O4-4, O4-5, O4-6, O4-7 O4-8, O4-9, O4-10, O4-11, O4-12, O4-13, O4-14, O4-15, O4-16, O4-24, O4-25, O5-26, O5-27, O5-28, O5-29, O5-30, O5-31, O5-32, O6-1, O6-4, O6-5, O6-10, O6-20, O6-46, O6-52, O6-53, O6-54, O6-55, O8-1, P26-1, P26-2, P36-1, P37-1
Hazardous Materials and Public Safety	O2-2, O5-8, O5-83, O5-84, P10-3
Invasive and Noxious Plant Species	O3-164, O3-165, O4-29, O4-30, O4-31, O4-32, O4-33, O4-34, O4-35, O4-36, O4-37, O5-59, O5-60, O6-5, O6-6, O6-24, O6-25, O6-26, O6-42, O6-43, O6-49, P26-3
Lands and Realty	A2-2, O3-22, O3-45, O3-154, O3-155, O3-189, O3-193, O3-194, O3-297, O3-298, O3-299, O4-41, O4-42, O5-30, O5-61, O5-62, O5-63, O5-64, O5-65, O5-66, O5-67, O5-68, O5-69, O6-30, O6-31, O6-32, O6-33, O6-34, O10-1, O10-2, O10-3, O10-4, O10-5, O10-6, O10-7, O10-8, O10-9, O10-10, O10-11, P39-5
Livestock Grazing	A3-3, A5-6, A5-16, O3-13, O3-25, O3-316, O3-317, O4-31
Mapping	A2-1, A2-28, A2-29, A2-30, A2-31, O3-23, O3-119, O3-156, O3-158, O3-332, O6-1
Mineral Resources	A2-22, O4-16, O4-17, O5-2, O5-79, O5-80, O5-81, O5-82, O5-83, O5-84, O6-3, O6-8, O6-14, O6-35, O6-37, O6-41, O6-56, P10-1, P10-2
Nonforested Vegetation	O6-59

Topic	Comment Number
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Table 3
Comments and BLM Responses

AGENCY COMMENTS

AGENCY COMMENTS

Comments

A1

"Janet Samford" <jsam@benewahcounty.org>

04/04/2006 12:06 PM

To <ID_CDA_RMP@blm.gov>

cc "Brad Wagner " <brad_wagner@blm.gov>, <Scott_Pavey@blm.gov>, "'William E. Schlosser, Ph.D.'" <schlosser@consulting-foresters.com>

Subject CDA RMP Comments

Re: Resource Management Plan (RMP) Draft Volume III. Maps, 5. WUI and Fire Use Areas.

1 Benewah County is currently updating our WUI map to designate all land within the Rochat Creek watershed as WUI. Rochat Creek is the source of water for the St. Maries municipality. This was an oversight in our original map but we have contacted our contractor, Northwest Management and asked that it be changed. The BLM is the largest landowner in the watershed with approximately 2,889 acres. The map in the draft shows this area as Fire Use. We would like to see this designated as WUI in the final plan.

Janet Samford
Benewah County Emergency Management
County Point of Contact for
Idaho State Fire Plan Working Group Benewah County
701 College Ave
St. Maries, ID 83861
208-245-8032

Responses

A1-1: BLM has revised the WUI-Fire Use map (see Map 5) to include the Rochat Creek watershed.

A2

May 8, 2006
Mr. Scott Pavey, RMP Project Manager
Bureau of Land Management
1808 N. Third Street
Coeur d'Alene, ID 83814-3407

Dear Mr. Pavey:

The Coeur d'Alene Tribe's Natural Resource Department appreciates the ability to submit comments on the Bureau of Land Management's (BLM) Draft Resource Management Plan/Environmental Impact Statement (Draft RMP/EIS) beyond the published deadline of April 14, 2006. The Tribe has not had enough time to review the document in the type of detail that is needed and by all of the Tribe's affected programs and departments. The coordination with BLM on the development of the RMP/EIS and resulting RMP is important and the Tribe believes it would benefit both parties to discuss this during a meeting to be held as soon as possible.

Broad management plans that set overall policy are very important and the Tribe has the following initial comments on the BLM's Final RMP/EIS.

1 1) MAPS: Please place the current Coeur d'Alene Reservation boundaries on all of your maps in order for the Tribe to better locate the RMP's impacts on Reservation resources.

2 2) LAND RETENTION/ACQUISITION: The Coeur d'Alene Tribe would like to meet with the BLM to discuss Draft RMP/EIS retention/acquisition areas that are located on and near the Coeur d'Alene Reservation. The Tribe has concerns regarding the BLM's plans to acquire land on the Coeur d'Alene Reservation. Also, the Tribe would like to discuss management of the 180 acres owned by BLM on the Reservation.

3 3) Tribal IRMP: The Coeur d'Alene Tribe would like the BLM to list the Tribe's Integrated Resource Management Plan (IRMP) Draft Programmatic Environmental Impact Statement (DPEIS), and eventually, the resulting IRMP, in the policies and plans coordination section in the BLM's Final RMP/EIS; additionally, the Tribe would like BLM to include a discussion on how the BLM's RMP/EIS is consistent or inconsistent with the Tribe's Preferred Alternative B in the IRMP DPEIS. The Tribe would like BLM to make any adjustments to the EIS that are needed in order to make the RMP/EIS consistent with the Tribe's draft EIS. This can also be a topic of a follow-up meeting with the Tribe.

4 4) AIR QUALITY: The Tribe would like BLM to discuss coordination with the Tribe's Air Quality Program in its goals.

A2-1: In response to this comment, BLM prepared a set of maps with the Reservation boundaries for the Tribe.

A2-2: As requested by the Tribe, BLM has met with them to discuss this, and other concerns.

A2-3: As requested by the Tribe, BLM has met with them to discuss this, and other concerns. BLM has also reviewed the Preferred Alternative of the Tribe's Integrated Resource Management Plan, and found nothing in the Proposed RMP/Final EIS that was inconsistent. BLM will work closely with the Tribe to identify ways to make the plans more complementary.

A2-4: As specified under all alternatives, BLM would coordinate activities affecting air quality with the Montana/Idaho Airshed Group, of which the Tribe is a member. BLM has also added an objective and action to the Air Quality section (Objective AQ 1.4 and AQ 1.4.1) that would require BLM to coordinate directly with the affected Tribe, regarding prescribed fire and wildland fire use within reservation boundaries.

Comments

A2 (Cont.)

5) RECREATION: The Tribe has noted the emphasis that the BLM has placed on Recreation in the RMP/EIS. The Tribe requests that BLM consult with the Tribe's Lake Management Department to coordinate recreation efforts on and near the Coeur d'Alene Reservation (as well as coordination with the Tribe's Culture Program as illustrated in comments below). 5

6) Coordination and Consultation: The Tribe would like BLM to add a section in the RMP/EIS that discusses overall coordination and consultation with the Coeur d'Alene Tribe in terms of implementation of the RMP on an ongoing basis within the Tribe's aboriginal territory. 6

Coeur d'Alene Tribe Cultural Resources Management Program Comments on Coeur d'Alene BLM office Draft RMP/EIS released January 2006

VOLUME I

Throughout document: recommend removing minimizing qualifiers to the word "impact" or "impacts" such as "minor" and "slight" (e.g. "minor impacts"). This is a subjective judgment and particularly in the areas of cultural resources, tribal trust issues, and so on, the assessment of what is "minor" or "slight" may be significantly different for Tribal members and staff than for BLM staff. 7

Table 2-1 "Management Guidance for All Alternatives"
Cultural resource discussion in begins on pg. 2-76

Alternative B, C, and D now propose "develop a long-term monitoring schedule by 2009 that identifies a representative sample of sites or TCPs that will be examined on an annual basis"
Alternative A has "recommend site protection measures to protect at-risk sites" 8
-Does this mean A has more or less monitoring?
-Why not 100% monitoring of all sites/TCPs?
-Are sites and TCPs mutually exclusive categories?
If so, provide clear definitions. If not, rephrase to reflect this.

Chapter 3 Affected Environment
3.2.9 Cultural Resources begins on page 3-44

All Cultural Resources "would be allocated to one or more use categories under all the alternatives addressed in this plan." 9
-Isn't the obligation to maintain all Cultural Resources even if there is no "use"?

Pg 3-68 lists the following as "major settlements on the reservation" with a reference date of 2004: "Benewah, DeSmet, Plummer, Tensed, and Worley." 10
-What about St. Maries?
-Where is the "major settlement" of Benewah?

2

A2 (Cont.)

-Why was the information obtained from the Economic Development Center rather than the Tribe? 10

Pg 3-69 "Pacific Crown Timber Products is the largest private employer of tribal members in this domain"... 11
-Should this be "Crown Pacific..."?
-If so, has their bankruptcy changed this information?

Traditional Uses Pg 3-69
"Currently, Native American tribes do not depend on commodity resources from lands managed by the CdA FO for their economic livelihood, but they do use resources on BLM public lands for subsistence and cultural purposes." 12
-What is meant by "subsistence" in this case?
-Generally "subsistence" hunting, fishing, etc are part of a household economy.

Chapter 4—Environmental Consequences

pg 4-110)
"* Acres and relative depth of ground-disturbing activities permitted and their potential for affecting known or unknown intact cultural resources or areas of importance to Native American or other traditional communities;" 13
-Recommend deleting word "intact". Cultural resources do not need to be completely intact to merit protection from further impacts.

pg 4-110 and 4-111
-This list of laws should add AIRFA and other relevant statutes.
-Why the word "any" before TCPs in the section "Impacts from Water Resources Management"? 14
-Same paragraph: recommend deleting word "slightly".

Pg 4-111
"Alternative B" paragraph.
This paragraph states "additional emphasis on measures to promote commodity and recreational species. These include species that have been fished or hunted traditionally and these actions would enhance opportunities to continue cultural use." 15
-These actions would also increase non-traditional use, competition for traditional species, and may increase recreational species (e.g. introduced fish like walleye) populations. Some of these species compete with and/or prey upon native species that are traditionally used.

Pg 4-117
1st paragraph (is under "cumulative impacts" section)
"The RMP recognizes that tribal knowledge contributes to the management of cultural resources and that traditional use areas or sacred sites can be TCPs that need to be treated as protected cultural resources." 16
-Some legal phrasing questions:

3

Responses

A2-5: A specific reference to coordination with the Tribe has been added to Action RC-D1.2.9.

A2-6: BLM is coordinating with the Tribe to determine the best means to accomplish this.

A2-7: These are subjective qualifiers that BLM used to distinguish what it determined to be lesser impacts from greater ones. BLM understands that Tribal members' and staff's opinions may differ from BLM's.

A2-8: Alternative A does not have more monitoring and in fact proposing the development of a monitoring schedule in the other alternatives will allow a more focused approach in the future. Development of a cultural resource monitoring schedule allows BLM to prioritize those sites or areas, including TCPs, that takes into account current or potential impacts as well as the significance of those resources. Thus, by developing a schedule more important sites will be monitored more frequently and the initial development of the schedule can also be coordinated with the Tribes and Idaho State Historic Preservation Office.

Because of workloads and funding limitations 100% of all sites can not be monitored. Establishing a schedule will focus the monitoring efforts to those sites or areas with the greatest need.

TCPs are considered cultural resources but not all cultural resources are TCPs. See the definition that BLM added to the glossary.

A2-9: Cultural resources are assigned to use categories. It is a mechanism to help guide future uses of the resource. The only category that may be of question is the Discharged from Management. This category is only for those sites that have been destroyed. Cultural resource Action CR-B1.3.1 recommends establishing a schedule to collect the necessary data to make informed use allocations. This also allows the BLM to coordinate these decisions with the affected Tribes and the Idaho State Historic Preservation Office.

A2-10: BLM has made these corrections and will coordinate with the Tribe to acquire accurate data in the future.

A2-11: This sentence has been deleted from the Proposed RMP/Final EIS.

A2-12: The term 'subsistence' has been deleted from the paragraph.

A2-13: This change has been made.

A2-14: The American Indian Religious Freedom Act (AIRFA) is referenced in the first sentence on page 4-111 at the end of the paragraph listing the primary statutes to which the Antiquities Act of 1906 was added. Also, "any" and "slightly" have been deleted.

A2-15: Before any introduction of a new species the BLM, Idaho Fish and Game, the affected Tribes, and any other interested parties would be consulted.

A2-16: "Are" would pertain to current management; "need to be" would pertain to future management.

Comments

A2 (Cont.)

16 -Should "or" be "and/or"?
-Is it meant that TCPs "need to be treated as protected cultural resources" or TCPs "are protected cultural resources"?

17 Section 4.5.3 Native American Trust and Interests (begins pg 4-184)
1st paragraph: -why only subsistence species? Not all culturally important species are subsistence related.

18 4.5.3.3 Cumulative Effects begins on pg 4-191

alternative A ... last paragraph pg 4-191 "...changes in the natural resource base brought about my insect and disease..."
-Change "my" to "by".

19 4.6 Unavoidable Adverse Impacts one paragraph pg 4-193
-These are written off with "Virtually all potential unavoidable adverse impacts are indirect, long-term, and difficult to quantify."
-This statement and the preceding generalized statements in the single paragraph discussion do not provide enough information to assess the unavoidable impacts of the proposed alternatives.

20 4.7 Irreversible and Irretrievable Commitment of Resources all on pg 4-194
pg 4-194 "Undiscovered cultural resources may be affected by the alternatives...Cultural resources are by their nature irreplaceable, so the alteration or elimination of any such resource, whether National Register-eligible or not, represents an irreversible and an irretrievable commitment."
-Yes indeed.

21 Pg 4-194 last paragraph: "The exact nature and extent of any irreversible and irretrievable commitment of resources cannot be defined due to uncertainties about location, scale, timing, and rate of implementation, as well as the relationship to other action and the effectiveness of mitigation measures."
-Again it seems that because it is difficult and imprecise, no information is given at all that allows the comparative evaluation of the alternatives for this issue.

22 Appendix F: Mineral Leasing Surface Use Stipulations
Cultural resources:
Stipulation: no surface occupancy allowed in areas of cultural or spiritual value to Native American Tribes.
Exception: "The authorized office may grant an exception if environmental analysis and Tribal consultation on a proposed action reveals that these values would not be impacted, or that impacts could be adequately mitigated."
Modification: "Through Tribal consultation, the boundaries of these areas may be changed."
Waiver: "This stipulation may be waved (sic) with written approval from the concerned Native American Tribal Council."

A2 (Cont.)

22 -Recommend: **There may be more than one concerned Native American Tribal Council. Written approval should be obtained from all concerned Native American Tribal Councils.
*correct spelling of "waved" to "waived"

23 Pg G-7
Relevance, point 1...notes that an area meets relevance criteria if it '''has a significant historic, cultural, or scenic value (including but not limited to rare or sensitive archeological resources and religious or cultural resources important to native Americans).'''
-Recommend correcting "native" to "Native"

24 Appendix J: Wild and Scenic Rivers Study
Pg J-1-3: note that there are Cultural and Historical criteria for "Outstandingly Remarkable Values" portion of the WSR designation
-*Cultural discussion pertains to ONLY prehistoric sites.* "The stream corridor contains prehistoric sites that are rare, have unusual characteristics, or possess exceptional human-interest values. Sites may have national or regional importance for interpreting prehistory, be rare, or represent an area where a culture or cultural period was first identified and described. Sites may have been used by two or more cultural groups or may have been used for rare or sacred purposes."

25 -*Historical states* '''The stream corridor contains sites or features associated with a significant event, an important person, or a cultural activity of the past that was rare or unusual in the area. Sites or features listed or eligible for inclusion in the National Register of Historic Places may be of particular significance.'''

-This discrepancy needs to be addressed.

26 Pg J-A-3 NOTE: '''A.2.6 Cultural
The river or area within the river corridor contains a site or sites where there is evidence of occupation or use by Native Americans. Sites must be rare or must have unusual characteristics or exceptional human interest values. Sites may have national or regional importance for interpreting prehistory; may be rare; may represent an area where culture or a cultural period was first identified and described; may have been used concurrently by two or more cultural groups; or may have been used by cultural groups for rare or sacred purposes.'''
-This is different than the "Cultural" criterion outlined in previous section where "prehistory was earlier in the statement making it imperative to the cultural designation.

27 -Refer back to J-1-3 section on "outstanding Remarkable Values" for "Cultural"
Question: "an area where culture....was first identified" Should this be "an area where *a* culture...was first identified"?

Responses

A2-17: The word "subsistence" has been deleted.

A2-18: Correction made.

A2-19: BLM feels that this paragraph is very specific.

A2-20: Thank you for your comment.

A2-21: The RMP provides general guidance for actions that may occur on BLM-administered lands. The plan itself, and the alternatives, are intentionally non-specific. Therefore, it is not possible to be more detailed than the description provided.

A2-22: The waiver statement has been changed to indicate that there may be multiple "concerned Tribal Councils."

A2-23: Correction made.

A2-24: Eligibility criteria listed in the Wild And Scenic Rivers Act specifically includes "cultural" and "historical". The criteria definitions used in the RMP Appendix J are paraphrased from BLM Manual 8351 – Wild and Scenic Rivers.

A2-25: Please see response A2-24.

A2-26: Please see response A2-24.

A2-27: This wording was paraphrased from the BLM Manual 8351 – Wild and Scenic Rivers.

Comments

A2 (Cont.)

VOLUME III--Maps

28 General comments:
The backcountry byway through Grandmother Mountain area will negatively impact cultural resources by sharing information about the area and providing increased access.
This byway is in alternatives B, C, and D (only the "no action" alternative A does not have it and A has other drawbacks).
-Could this byway be removed from alternatives B, C, and D?

29 Alternatives B,C, and D have Rochat Divide and other areas designated as Special Recreation Management Areas and Developed Recreation Sites. Maps 20-23 will illuminate this.
There are trails and other cultural sites in the vicinity of recreation sites. Suspect that the areas need to be surveyed for cultural resources. Less area developed for recreation means less traffic in cultural areas particularly the Rochat Divide/Pine Creek, Silver Valley, and Widow Mountain. Further north, Gamlin Lake near Lake Pend Oreille, is planned for development that could compromise cultural resources.
-If development does occur, suggest using planning, education, and all other means to protect cultural resources.

30 Map 44 "land and realty alternative D" demonstrates that more land area is open to consideration for acquisition under this alternative than the others. There is more potential for getting land into BLM (federal) ownership and less potential for having land go out of federal control. However, potential is not the actual outcome.

31 Maps 46-64 illustrate proposed "Areas of Critical Environmental Concern"
These could offer protection to cultural resources depending on how they are managed.

32 Summary
The Tribe believes that it is in everyone's best interests to coordinate planning as much as possible. There are a number of items that the Tribe would like to discuss with BLM regarding the RMP/EIS in order to work more collaboratively. The Tribe would like to meet with the Bureau of Land Management to further discuss the RMP/EIS. Please contact my office at (208) 686-8802 to schedule a meeting at the earliest convenience for both parties.

Sincerely,

Tiffany Allgood
Environmental Action Plan Coordinator

Responses

A2-28: BLM has removed backcountry byways from all alternatives in the PRMP/FEIS.

A2-29: If a recreation site development is proposed a cultural resource inventory would be completed, consultation initiated with affected Tribal groups, and the appropriate environmental review document completed.

By actively managing recreation the BLM will be better able to proactively protect cultural resources.

A2-30: The boundaries on this map are simply an estimate of the lands BLM currently manages that meet the criteria

A2-31: Some proposed ACECs were identified for cultural values. Indirect effects of designation on cultural resources are discussed in Chapter 4, Section 4.2.11.2. for retention and acquisition. The criteria themselves would be used to determine whether to acquire new lands.

A2-32: BLM has coordinated with the Tribe as requested.

A3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

April 13, 2006

Reply to
Attn Of: ETPA-088 Ref: 05-073-BLM

Scott Pavey
Bureau of Land Management
Coeur d'Alene Field Office
1808 North Third Street
Coeur d'Alene, ID 83814-3407

Dear Mr. Pavey:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft Environmental Impact Statement (EIS) for the Coeur d'Alene Resource Management Plan in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309, independent of NEPA, specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our policies and procedures, we evaluate the document's adequacy in meeting NEPA requirements.

The draft EIS analyzes one no action alternative and three action alternatives The planning area is located in the Panhandle region of northern Idaho and encompasses 5,077,776 of private and public lands. Approximately 96,770 acres of that planning area are administered by the BLM. Alternative A (No Action) considers the continuation of the current management. Alternative B emphasizes active management for commodities, amenities and services. Alternative C includes management strategies to preserve and protect resources such as wildlife habitat, water quality, etc. Alternative D (Preferred Alternative represents a variety of management activities intended to balance commodity and non-commodity resources usage.

1 We have rated the EIS, EC-2 (Environmental Concerns-Insufficient Information). We support the selection of the preferred alternative, since it strives to balance resource protection with active management of commodity resources. However, we have some questions regarding clarity of the document and concerns regarding resource areas. We recommend including additional discussion on air and water quality issues.

We appreciate the opportunity to review the draft EIS for this project. Our rating and a summary of our comments will be published in the Federal Register. Enclosed please find a copy of the rating system used in our review for your reference. Should you have any questions

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A3-1: Please see responses A3-3, A3-4, A3-5 and A3-6.

Comments

A3 (Cont.)

regarding our comments please contact Denise Clark by phone at (206) 553-8414 or by email at clark.denise@epa.gov, or me at (206) 553-1601.

Sincerely,

/S/

Christine B. Reichgott, Manager
NEPA Review Unit

Enclosures

cc: Idaho Operations Office

A3 (Cont.)

EPA Comments on the
Coeur d'Alene Resource Management Plan DEIS

Preferred Alternative

Although Alternative C would be the environmentally preferred alternative, EPA believes that Alternative D provides management that would protect sensitive resources while allowing more active management than Alternative C. We are very pleased that the RMP would incorporate the goals and objectives from the Interior Columbia River Basin Strategy. The use of riparian conservation area guidelines pursuant to the Coeur d'Alene Native Fish Strategy will contribute to improvement in water quality and aquatic habitat improvements as well as prevention of future impacts. 2

Livestock Grazing

The draft EIS proposes to either keep the grazing allotments at the same level under alternatives A and B or reduce them by 1,218 acres under Alternative C and D. Section 3.3.2, **Livestock Grazing**, in the Affected Environment Section lists the allotments managed by the BLM and their current status. However, the EIS fails to describe the condition of each allotment. We recommend including the a summary of environmental condition of each allotment, including quality of forage plants, streambank stability, and sediment inputs to streams that may exist on the allotment or that are affected by grazing. We also recommend that Section 4.2.3, **Water Resources**, describe which allotments would be closed to grazing, the environmental benefits that would result from closing the allotments as well as the economic impacts that would potentially result from closure. 3

Air Quality

We understand that prescribed and wild fire can potentially impact air quality. One tool that assists in the management of smoke emissions is a smoke plan. We are concerned with the release of particulate matter (PM) caused by prescribed fire but realize that reducing some fuel loads now may prevent low frequency, high intensity fires releasing more PM later. The draft EIS states that the BLM participates in the Montana-Idaho Airshed Group and coordinates its prescribed burning with the Idaho Department of Environmental Quality (IDEQ) and other federal agencies. To manage these activities, we support working with the state to develop a smoke management plan and recommend including information on the plan in the final EIS as well as demonstrate how the project will meet National Ambient Air Quality Standards. 4

Water Resources

Table 3-2 lists the Clean Water Act designated impaired waterbodies near BLM land. We recommend that the EIS discuss how the proposed alternatives will facilitate these streams meeting water quality standards. We understand that effective implementation of BMPs and the CNFISH goals and objectives would likely assist in the recovery of some of the listed streams. We recommend that the final EIS discuss the streams that are likely to be improved by implementation of the revised RMP. In addition, we recommend that the final EIS identify how the BLM will coordinate with the IDEQ to insure that activities on BLM land will contribute to meeting the goals of the Total Maximum Daily Loads that have been developed and those that are currently in development as well as not contribute to degradation of existing high quality water. 5

Responses

A3-2: Thank you for your comment.

A3-3: Each allotment is reviewed during the Standard and Guideline process where specific information is gathered, reviewed, and resolved. An RMP gives BLM overall direction; specific allotment detailed evaluation is not part of this process.

A3-4: In addition to the overall air quality program guidance and IDEQ coordination provided by the Idaho-Montana Airshed Group, BLM prepares a site-specific, project-level smoke management plan for each prescribed burn.

A3-5: Because of the generally low percentage of BLM-administered lands within many of the TMDL watersheds, in most cases the activities outlined in the RMP will help, but not necessarily achieve, the goals of the TMDL. On the project level, BLM will coordinate with IDEQ to design site-specific BMPs in TMDL watersheds. This currently involves jointly consulting with IDEQ and the Army Corps of Engineers on 404 permit applications within TMDL watersheds. The Corps issues a 404 permit and IDEQ issues a letter of consent. BLM will continue to comply and stay current with IDEQ or EPA regulations regarding TMDLs as the process evolves.

Comments

A3 (Cont.)

2

Source Water

The EIS did not discuss any source water areas in the project area and therefore, this raises concern regarding potential impacts to source water if there are any source water areas in the project. Public drinking water supplies and/or their source areas often exist on lands under federal management. Activities such as timber harvesting, grazing, and recreation, may adversely affect waters that serve as sources of drinking water for communities. The 1996 amendments to the Safe Drinking Water Act (SDWA) require federal agencies that manage lands that serve as drinking water sources to protect these source water areas. source water is untreated water from streams, rivers, lakes, springs, and aquifers that is used as a supply of drinking water. source water areas are the sources of drinking water delineated and mapped by the states for each federally-regulated public water system.

State agencies have been delegated responsibility to conduct source water assessments and provide a database of information about the watersheds and aquifers that supply public water systems. We recommend that the USFS/BLM contact the state agency (either DEQ or DHS) responsible for developing and maintaining this database to help identify source water protection areas within or downstream of the project area. Typical databases may contain GIS and Access information for the watersheds and aquifer recharge areas, the most sensitive zones within those areas, and the numbers and types of potential contaminant sources identified for each system.

6

EPA recognizes that providing high quality drinking water to protect human health is a high priority for land management agencies. Implementing protective actions and land use decisions can be very effective in providing clean source water to public intakes and wells. This will preserve the use of public funds that would otherwise be spent to upgrade treatment facilities to remove contaminants downstream. Therefore, EPA recommends that the draft EIS:

- Identify all federally-regulated source water protection areas and state-regulated source water protection areas, if the state agency maintains such a list, within or downstream of the project area;
- Identify all activities that could potentially affect source water areas;
- Identify all potential contaminants that may result from the proposed project;
- Identify all measures that would be taken to protect the source water protection areas in the draft EIS.

Also, if the project has the potential to affect a source water protection area, we recommend that the draft EIS address the enclosed document, "Steps to Take to Incorporate Source Water Protection into Your Plans and Projects."

We have also enclosed a draft document, EPA Region 10 Source Water Protection Best Management Practices for USFS, BLM. This document is a compendium of BMPs that were collected from a host of sources directed at protecting drinking water. This document is intended to provide a broad list from which to select appropriate BMPs that can be applied to a specific plan or project. The list is not comprehensive and additional BMPs may be appropriate to ensure adequate protection of source water areas.

Responses

A3-6: Source water suggestions have been incorporated into the Proposed RMP/Final EIS, particularly the coordination with IDEQ. BLM added the BMPs in the draft list from EPA to Appendix A.

BLM uses the source water database provided to us by IDEQ. BLM also continues to notify and coordinate with the public water system operator for proposed activities within a source water areas.

Specific potential contaminants and protective measures for a proposed activity will be identified during project level planning.

A4

STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

2110 Ironwood Parkway • Coeur d'Alene, Idaho 83814-2648 • (208) 769-1422

Dirk Kempthorne, Governor
Toni Hardesty, Director

April 20, 2006

RECEIVED
APR 2 1 2006
BUREAU OF LAND MANAGEMENT
COEUR D'ALENE ID 83814

Scott Pavey
Bureau of Land Management
Coeur d'Alene Field Office
Attn: RMP
1808 N. Third Street
Coeur d'Alene, ID 83814

RE: Comments on BLM Draft Resource Management Plan and EIS

Dear Mr. Pavey,

The Coeur d'Alene Regional Office of the DEQ has reviewed the water quality portion of this draft plan and has the following comments:

1. Table 3-2 lists impaired water bodies near BLM land. This information was obtained from our 1998 303(d) list. The table is missing some pollutants and has an incomplete list of impaired waters in some of the watersheds. However, we are happy to announce that our 2002 303(d) list has been approved by EPA and this is the list you should be referencing in the Final EIS. It is available on our website. Please include those waters that have total maximum daily loads (TMDLs) developed as well as those currently listed (sections 4a, 4b, 4c and 5). Also recognize that some TMDLs include much of the watershed above the listed segment.

1

2. Section 4.2.3.2 discusses impacts of soil resource management for each alternative and potential effects on water resources. The Alternative A discussion indicates that by implementation of best management practices (BMPs) associated with new activities such as road building and timber harvest, water quality would be improved. This is rarely the case with new activities, however, it can be true for existing disturbances. New activities often add significant pollutant loads even when BMPs are utilized. This concept is particularly important to understand when working in impaired watersheds in order to comply with the Idaho Water Quality Standards (Standards). It is also important to realize that everyone's activities, whether noted or not in the TMDL, contribute to further impairment or improvement of the watershed.

2

A4-1: Table 3-2 and subsequent analysis were revised according to this comment.

A4-2: Thank you for your comment. This and all comments submitted were considered when BLM prepared the FEIS.

Comments

A4 (Cont.)

Scott Pavey
April 20, 2006
Page 2

2 Specifically, the Standards require that 303(d) listed impaired waters that have a high priority for development of a total maximum daily load must not have new or increased discharges of the causative pollutants (IDAPA 58.01.02.054.04.). Once the TMDL is developed and approved, the activity will be allowed only if consistent with that TMDL.

3 If you are planning a pollutant loading activity such as road building in a listed or TMDL watershed, as discussed above, you must reduce the load elsewhere in the watershed to so it remains constant or decreases. Examples of load reducing projects are road obliteration, cattle exclosure fencing, bank stabilization projects, reforestation along stream corridors, etc. which can significantly reduce sediment and temperature pollutants. Realizing a net reduction in loading with every activity along with special load reducing projects will gradually move the water body towards recovery of all beneficial uses.

For further information on the status of a stream or questions about the rules please don't hesitate to contact me.

Sincerely,

June Bergquist

June Bergquist
Regional Water Quality Compliance Officer

cc: IFG-Mary Terra-Berns
EPA Boise-John Olson

Responses

A4-3: BLM is aware of special requirements within TMDL watersheds, and has designed BMPs for road building and other activities with these requirements in mind. BLM will continue to work with EPA to refine our BMPs for activities in TMDL watersheds.

A5

RECEIVED
APR 14 2006
BUREAU OF LAND MANAGEMENT
COEUR D'ALENE ID 83814

IDAHO DEPARTMENT OF FISH AND GAME
PANHANDLE REGION
2885 West Kathleen Avenue
Coeur d' Alene, Idaho 83815

Dirk Kempthorne/Governor
Steven M. Huffaker/Director

April 6, 2006

Scott P.

Mr. Eric Thomson
Bureau of Land Management
Coeur d'Alene Field Office
1808 N. Third Street
Coeur d'Alene, ID 83814-3407

Dear Eric:

REFERENCE: DRAFT COEUR d'ALENE RESOURCE MANGEMENT PLAN AND EIS

Thank you for the opportunity to comment on the Draft Coeur d'Alene Resource Management Plan and Environmental Impact Statement.

We realize the importance of this document and appreciate the effort that your staff has invested in its preparation and development. The document is well organized and straightforward, which facilitated our review. Additionally, it is obvious that an incredible amount of energy went into the development of the associated reference maps. Although we were unable to review all of the maps due to time constraints, they did provide effective images for orientation and analysis.

The following comments refer to Appendix D: CNFish Strategy – INFISH Crosswalk.

1
- **Riparian Management Objectives** – Forested and non-forested systems.
  - The CNFish Strategy currently reads "The BLM is encouraged to establish…" We recommend that it read "The BLM will include all 6 INFISH RMOs in the revised RMP and other RMOs (e.g., substrate) may be added."

2
- **RHCAs/RCA**
  - These acronyms are not in the list of acronyms.

3
- **RF2-c**
  - We would like to review the Transportation/Travel Management Plan as it becomes available.

4
- **RF-3c**
  - Remove the comma after obliterating.

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A5-1: BLM modified the CNFISH RMOs that appeared in the Draft RMP/EIS (see Appendix D of the Proposed RMP/EIS). The six INFISH RMOs are included in CNFISH, though some have been modified, and additional RMOs have been added. BLM made these changes to better reflect current information and science.

A5-2: Thank you for pointing out this oversight. The acronym list has been updated accordingly.

A5-3: We intend to keep Idaho Department of Fish and Game fully engaged with travel and transportation implementation planning.

A5-4: CNFISH has been revised to accommodate this request.

Comments

A5 (Cont.)

Mr. Eric Thomson - Page 2
April 6, 2006

5 • **RF-4**
  - We recommend that the CNFish measure read the same as INFISH except replace retard with delay or prevent in line 11.

6 • **GM-1**
  - We recommend that range project plans, allotment management plans, and annual plans of operation incorporate measures to protect waterways and riparian vegetation (e.g., fencing) from grazing livestock.

7 • **GM-2, RM-1, LH-2, FW-2**
  - Replace retard with delay.

8 • **FM-2**
  - Change the last sentence to, "Use an interdisciplinary team, including a fisheries biologist, during pre-suppression planning to predetermine incident base and helibase locations.

9 • **FM-5**
  - We are uncertain why this conservation measure was deleted. Depending on the intensity and location of the burn area, it may be critical to develop a rehabilitation treatment plan to inhibit water temperature increases and excess sediment from being delivered to important streams and RCAs.

10 • **LH-3**
  - We recommend that the CNFish measure read the same as INFISH except replace retard with delay or prevent in line 8.

The following comments (in italics) refer to Appendix I: Recommendations for Coordinating Land Management Activities with Elk Habitat Preferences. Although the guidelines (*The Guidelines for Evaluating and Managing Summer Elk Habitat in Northern Idaho* (Idaho Department of Fish and Game, 1984)) in this appendix are dated, they are still applicable.

Timber Harvest Recommendations

1. Any silvicultural method that changes the vegetation so that it no longer meets the definition of cover should be confined to an area with a maximum width of 1,000 feet and should be bordered on all sides by cover not less than 800 ft. width. *No changes.*

2. Clearcutting is usually preferred over other types of timber harvest techniques because it provides better forage and reduces the amount of future harvest activity in the area. *This recommendation is acceptable as long as recommendation 1 is followed.*

3. Maintain slash depth at less than 1.5 feet in order to minimize impact on elk movements, distribution and habitat use. *No changes.*

4. In appropriate habitat types, broadcast burn logging slash in the fall to get maximum elk forage protection. *Agreed.*

A5 (Cont.)

Mr. Eric Thomson - Page 3
April 6, 2006

5. Plan timber sales so maximum duration of disturbance in any one area is two years in succession. This can be accomplished with smaller sales, or scheduling larger sales by compartment in a certain sequence through contract stipulations. This would eliminate random logging over the entire sale area. *No changes.*

6. Refrain from logging areas when elk would normally be using them, if feasible. For example, do not log important summer habitat during that season especially if a viable option is to log during the winter. *No changes.*

7. If summer logging is planned on elk summer range, provide adjacent security areas at least as large as the area being disturbed for the animals to move to during periods of timber harvest and/or road building activity. Try to provide a ridge line between the disturbed area and security area. It is preferable to have several adjacent security areas available. *No changes.*

Road Recommendations

8. When major elk trails are bisected by roads, crossings should be provided across cut and fill slopes so they do not exceed natural gradients. This is especially necessary when cut slopes are over 8 ft. high and/or have a greater than ¾ to 1 slope. *No changes.*

9. Vegetation removal along road sides should not extend any further from road edge than necessary for logging activities. *No changes.*

10. Slash depths adjacent to roads in cleared rights-of-ways should not exceed 1.5 feet in depth. In areas where this level of slash disposal is impractical, openings 16 feet wide thru the slash at 200 foot intervals are recommended, especially on ridges and trail crossings. *Agreed.*

11. Maintain a minimum 300 foot buffer strip between open forest roads and openings which serve as feeding areas. *Agreed.*

11 12. Roads that are to remain open should avoid saddles, meadows, riparian areas, and ridge tops as these are usually major elk use areas. *Although a good suggestion, at times this may be difficult to adhere to; therefore, the guidelines for buffers and security areas should be enforced.*

12 13. Design roads so they can be easily and effectively closed (either permanently or temporarily) at a low cost. *Permanent closures are the most effective protection for elk; however, closing historical roads is very controversial. New road construction should be temporary in nature and permanently closed/re-contoured when work is completed unless the new road is part of an extensive access management plan.*

14. Install gates at onset of road building activity when the objective is to prevent human use patterns from becoming established. These gates should be closed and locked during any period of logging inactivity exceeding 24 hours. *Agreed.*

Responses

A5-5: CNFISH has been revised to accommodate this request.

A5-6: This conservation measure already states that range project plans, allotment management plans, and annual plans of operation would be developed revised and maintained to achieve RMOs. The RMOs include objectives for water temperature, water quality and riparian vegetation, so we would be protecting waterways and riparian vegetation. The conservation measure does not preclude the use of fencing to achieve the RMOs.

A5-7: CNFISH has been revised to accommodate this request.

A5-8: CNFISH has been revised to accommodate this request.

A5-9: BLM has added this conservation measure to CNFISH.

A5-10: CNFISH has been revised to accommodate this request.

A5-11: BLM will adhere to guidelines for buffers and security areas per recommendation #18.

A5-12: This guideline has been modified. See Appendix I.

Comments

A5 (Cont.)

Mr. Eric Thomson - Page 4
April 6, 2006

15. Inform the public by all types of news media, including signs on gates, about reasons for and dates of road closures. *Agreed.*

13 16. Replace gates with permanent barriers after logging activity where maximum elk security and habitat use is desired. *Although we appreciate permanent barriers, recontouring is the most effective way to protect elk habitat.*

17. Revegetate the driving surface as well as cut and fill slopes on permanently closed roads. *Agreed.*

14 18. Maintain buffer strips (that will qualify as hiding cover if possible) along roads left open during the normal elk use period. These buffers should be at least two sight distances wide when separating the road form an opening. *Agreed. You should define "site distance" though. For secure migration corridors we generally recommend retaining enough cover to hide to hide 90% of an elk at 200 feet.*

Protecting Special Habitat Components

19. Consult a wildlife biologist about the occurrence and/or importance of special habitat components on a case by case basis. *Agreed.*

15 20. Maintain the value of licks and wallows by buffering from disturbance for at least two site distances. *See comment #18*

16 21. Do not permit activities such as timber harvest, livestock grazing, or road building on established calving and rearing areas during the period of May 1 through July 15. *Will established calving and rearing areas be determined on a annual basis?*

17 22. Protect known major elk travel routes with buffer strips on either side for at least two site distances. *See comment #18*

Thank you for the opportunity to comment. We look forward to reviewing the Final draft when it becomes available.

Sincerely,

Charles E. "Chip" Corsi
Regional Supervisor

CEC:MTB:kh

C: Tracey Trent, NRPB Boise

File: BLM - RMP

Responses

A5-13: This guideline has been modified. See Appendix I.

A5-14: Change made as requested. Definition comes from Thomas et. al. (1979: p. 109).

A5-15: Change made as requested. Two site distances equal 400 feet.

A5-16: Currently, IDFG has not identified any calving and rearing areas on BLM-administered lands. The BLM will continue to consult with IDFG to identify new areas.

A5-17: Change made as requested. Two site distances equal 400 feet.

Comments	Responses

ORGANIZATION COMMENTS

Comments

O1

Back Country ATV Assn, Inc.

PO Box 611,
Athol, ID 83801
www.backcountryatv.org

February 15, 2006

BLM Coeur d' Alene Field Office
ATTN: RMP
1808 N Third Street
Coeur d' Alene, ID 83814

As President of Back Country ATV Association of Coeur d' Alene, I represent over 250 active members and 32 Associated Business Members.

Back Country ATV Association is an organization dedicated to keeping our public lands *open*. By working with state, federal, and private organizations we can secure long-term usage which benefits all trail users. We actively oppose any laws and regulations that are determined to be detrimental to the best interest of our members. We look for ways to support other ATV clubs that shares mutual goals and objectives, hence expanding our ATV community. We also take environmental concerns seriously. We assist in trail clearing efforts, having our volunteer labor augment the primary agency resources. Back Country ATV believes public lands should be left in the same condition or better upon completion of our organized rides.

We want to acknowledge the BLM and all the Clubs and Associations that have been working on the RMP Planning Process for the past 2 years. We commend you on the hard work and the resulting Documents are proof of this. It is a very important milestone you have all reached and is a compliment to the existing Federal Land Policy Act of 1976. This is proof that the work that has gone into this planning process will survive for the next 20 years.

1 Upon review by our membership leaders, of the Draft RMP/EIS, and in keeping within the function of our club to interface with local, state and federal governmental organizations, to help us assure equal rights in the National Forest, **we endorse the Alternative D** the (Preferred Alternative) as presented. We also feel that it represents the best mix and variety of management actions, to resolve the planning issues, and to achieve a balance between all the user groups involved.

2 We are grossly opposed to the BLM taking no action as in Alternative A, as it will be too prohibitive, when it comes time for implementing management measures needed to address our concerns, related to the growing recreational uses we enjoy, and the adverse impact on the local economies of our area. We acknowledge some of the constraints this alternative impacts, but concede to the fact that we must be flexible in the decision making in order to continue to use our public lands.

Thank you for this opportunity to publicly comment on this document.

Sincerely,
Richard L Lambert
President
Backcountry ATV Association, Inc.

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COEUR D'ALENE ID 83814

O2

Coeur d'Alene Audubon
P.O. Box 361
Coeur d'Alene, ID 83816

Scott Pavey
United States Department of the Interior
Bureau of Land Management
Coeur d'Alene Field Office
1808 N. Third Street
Coeur d'Alene, ID 83814-3407

March 20, 2006

Dear Mr. Pavey:

The following comments concern the **Draft Coeur d'Alene Resource Management Plan and Environmental Impact Statement** (DEIS).

Preferred Alternative:

1 We support Alternative C as described in the DEIS. This Alternative would provide the highest level of environmental protection for wildlife habitat, fisheries, and water quality in the planning area. Alternative C would also create 19 new Areas of Critical Environmental Concern, and all eligible stream segments would be found suitable for inclusion in the National Wild and Scenic River System.

2 Concerning the proposed closure of 149 acres in the planning area with Alternative C as shown on page ES-4, the Final EIS should supply high quality information that will indicate whether this Alternative would continue to allow access to areas that have identified hazardous materials. It appears this Alternative would allow for access to 320 acres that include hazardous materials, in contrast to Alternative D that would close a total of 469 acres.

Old Growth Issues:

3 The vegetation analysis in Volume I of the DEIS did not include any old growth data or maps that indicate current old growth stands in the planning area. The discussion on page 4-11 of the DEIS concerns incomplete or unavailable information. The following sentence is found on page 4-11. "No incomplete or unavailable information was deemed essential to a reasoned choice among the alternatives analyzed in this EIS." Appendix C in Volume II consists of US Forest Service Old Growth Definitions, but no data or maps.

The Final EIS needs to indicate whether accurate BLM old growth information exists for the planning area. If accurate old growth information is unavailable, what information was used when analyzing potential impacts to old growth stands with Alternatives B, C, and D?

We wish to remain on the mailing list for this project. Thank you for considering our comments.

Sincerely,
Lisa Hardy
President
Coeur d'Alene Audubon

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COEUR D'ALENE ID 83814

Responses

O1-1: Thank you for your comment.

O1-2: Thank you for your comment.

O2-1: The range of planning issues identified during the public scoping period indicated that while resource conservation is a goal that the public expects of BLM when managing their resources, many constituents see BLM lands as a source of renewable or non-renewable commodities or as a location to practice recreational practices that may not be promoted under the Conservation Alternative (Alternative C). To accommodate those needs while still providing a structured framework to conserve and protect natural and cultural resources, BLM developed Alternative D as a compromise. More specifics about the process of choosing the preferred alternative are given in Section 2.3.1 of the DRMP/EIS.

O2-2: Under Alternatives B, C and D areas with hazardous materials would be protected by the Limited Travel Area designation that restricts motorized vehicles to the designated roads near or through the sites. In addition, Alternative D would close all sites with significant known hazardous materials (149 acres) to motorized travel. This was proposed in part to incur the need for BLM approval of mining plans as required by 43 CRF 3809.11, and as alternative to making the major sites ACEC areas (see Appendix G).

O2-3: Vegetation treatments in the vicinity of old growth stands would follow direction in the Vegetation - Forests and Woodlands Action VF-B1.2.6, VF-C1.2.6, or VF D1.2.7. Location data on old growth stands is not necessary to determine the affects of these actions.

Comments

O3

CAPITAL TRAIL VEHICLE ASSOCIATION (CTVA)
P.O. Box 5295
Helena, MT 59604-5295

October 21, 2005

BLM Coeur d'Alene Field Office ATTN: RMP
1808 North Third Street
Coeur d'Alene, ID 83814-3407
ID_CDA_RMP@blm.gov

Re: Comments on the draft Coeur d'Alene Resource Management Plan

Dear Sir/Madam:

We have assembled the following information and issues from our members and other motorized recreationists for the project record. We appreciate the opportunity to provide our comments for the draft Coeur d'Alene Resource Management Plan. We enjoy riding our OHVs on primitive trails and roads on lands managed by the Bureau of Land Management and these provide a significant source of these OHV recreational opportunities. We feel strongly about OHV recreation because of the following:

Enjoyment and Rewards of OHV Recreation

- Opportunity for a recreational experience for all types of people.
- Opportunity to strengthen family relationships.
- Opportunity to experience and respect the natural environment.
- Opportunity to participate in a healthy and enjoyable sport.
- Opportunity to experience a variety of opportunities and challenges.

Acknowledged Responsibilities of Motorized Visitors

- Responsibility to respect and preserve the natural environment. We are practical environmentalists who believe in a reasonable balance between the protection of the natural environment and the human environment.
- Responsibility to respect all visitors.
- Responsibility to use vehicles in a proper manner and in designated places.
- Responsibility to work with land, resource, and recreation managers. We are committed to resolving issues through problem solving and not closures.
- Responsibility to educate the public on the responsible use of motorized vehicles on public lands.

We feel that we are also representative of the needs of the majority of other public land visitors who may recreate and not be organized with a collective voice to comment on their needs during the public input process. These independent multiple-use recreationists include visitors who use motorized routes for weekend drives, mountain biking, sightseeing, exploring, picnicking, hiking,

O3 (Cont.)

rock climbing, skiing, camping, hunting, RVs, shooting targets, fishing, viewing wildlife, snowmobiling, accessing patented mining claims, and collecting firewood, natural foods, rocks, etc. Mountain bikers seem to prefer OHV trails because we clear and maintain them and they have a desirable surface for biking. Multiple-use visitors also include physically challenged visitors who must use wheeled vehicles to visit public lands. All of these multiple-use visitors use roads and motorized trails for their recreational purposes and the decision must take into account motorized designations serve many recreation activities, not just recreational trail riding.

Many federal actions have led to the continual closure of motorized recreational opportunities and access and at the same time the number of OHV recreationists has grown to 50 million. The motorized closure trend has created significant cumulative effects and has reached the point where it is causing severe public distress. Reasonable alternatives to motorized closures must be pursued. The continual loss of motorized recreational opportunities is our primary concern. We would ask that this project address the attached checklist of issues and incorporate the goals and needs identified. Using this checklist would help identify and address concerns and, hopefully, the needs of the public would be adequately met by implementing a reasonable multiple-use alternative.

Basically in order to address our concerns the project evaluation must address:

1. The majority of visitors to the project area do so to enjoy multiple-use opportunities including motorized access and motorized recreation opportunities.
2. Why are motorized recreationists the only ones to lose ground in every action?
3. Where does the public go to replace the motorized access and motorized recreation that will be closed?
4. What is the cumulative effect on the public of this motorized access and motorized recreational closure combined with all other motorized access and motorized recreation closures in the state?
5. The development of a plan to mitigate the significant impacts on the public from the loss of motorized access and motorized recreational opportunities from the proposed action and the combined cumulative effect of all other actions in the state.
6. There are no compelling reasons to close as many motorized access and motorized recreational opportunities as proposed. It is simply contrary to the public need in the area and the way that the public uses the area.
7. There are compelling reasons to maintain and enhance the existing level of motorized access and motorized recreation in the project area.

The BLM lands in the Coeur d'Alene Resource Management Plan project areas with their current level of motorized access and recreation is where we go to enjoy motorized recreation. The project area and motorized recreation is where we go and what we do to create those memories of fun times with family and friends. Management of these lands for multiple-uses including reasonable motorized use allows the greatest enjoyment of these lands by the widest cross-section of the public to continue. These lands are designated as multiple-use lands and we ask that management for multiple-use continue.

Our comments document that the management trend of motorized closures is not responsible to the public's needs for motorized access and recreation and is contrary to the multiple-use management

Responses

Comments

O3 (Cont.)

directives specified by congress. The agency can no longer ignore that motorized access and recreation are the largest (over 50 million) and fastest growing group of visitors. The agency can no longer ignore the needs of motorized recreationists and act irresponsibly by continuing to close a large percentage of existing motorized access and recreation opportunities. The agency can no longer ignore the significant cumulative effect that all of the motorized closures over the past 30 years have had on motorized recreationists.

There is nothing radically wrong with the existing condition except that it does not meet all of the needs of motorized recreationists and does not adequately address the growing needs of motorized recreationists. These are the supreme issues that this action must address. The current evaluation and proposal must adequately address these two issues. The current proposal does not accomplish what should be the supreme goals of this action and that is to meet the needs of motorized recreationists both today and tomorrow. We respectfully request that the evaluation and proposal be re-directed to adequately address these issues and goals.

Motorized recreationists have become the new conservationists[1]. We are ready and committed to working with the BLM to preserve and enhance motorized trails for all recreationists through responsible environmental protection. We respectfully ask that the selected action for the Coeur d'Alene Resource Management Plan be structured to produce this end result by addressing and implementing the comments provided. We respectfully ask that all of our comments and information be used to justify motorized access and motorized recreational opportunities in the project area and to counter any opposition to those opportunities.

Sincerely,

Action Committee
Capital Trail Vehicle Association (CTVA)[2]
P.O. Box 5295
Helena, MT 59604-5295

Contacts:
Don Gordon at (406) 458-9577 DGordon315@aol.com
Bob Mullenix at (406) 449-2470 mllnxbj@cs.com
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Attachments: Checklist of Issues Affecting Motorized Recreation

CC: Russ Ehnes, President MTVRA
Mona Ehnes, President GFTBRA

[1] Rothman, Hal, New West Front Page, January 15, 2006. http://www.newwest.net/index.php/main/article/5318/
[2] CTVA is also a member of Montana Trail Vehicle Riders Association (MTVRA) and Blue Ribbon Coalition (BRC). Individual memberships in the American Motorcycle Association (AMA), Western Environmental Trade Association (WETA), United Four Wheel Drive Association (UFWDA) and Montana Multiple Use Association (MMUA)

O3 (Cont.)

Checklist of Issues That Affect Motorized Recreation

May 4, 2006

INTRODUCTION

NEPA and CEQ guidance require that the proposed action be issue-driven. Additionally, many past actions have enacted wholesale motorized closures. The cumulative effect has become significant and this trend is no longer acceptable. Therefore, meeting the unanswered needs and frustrations of over 50 million motorized recreationists is the most significant issue at hand for this proposed action.

This action and others to follow should address the issues and needs of the public by;
(1) Preserving all reasonable existing motorized recreational opportunities,
(2) Enhancing existing and developing new motorized opportunities to address the growing needs of the public for motorized recreational opportunities, and
(3) Implementing mitigation plans to compensate for excessive amount of past motorized closures.

The following is a checklist of issues that affect motorized recreationists and define the current management situation. This checklist is provided with the request that it be used to develop, select, and defend a reasonable multiple-use alternative. For every issue presented, there is a positive action that could be taken that would address the issue. Many solutions are obvious. For those problems that have less obvious solutions, motorized recreationists would work collaboratively with the agency to develop innovative solutions. We are committed to working towards that end and provide this checklist in the spirit of cooperation.

Checklist of Issues:

Note:

1 Please note that many of our comments include discussion of adjacent national forests lands in the Coeur d'Alene area. Public use of the project area is closely tied to the management of national forest lands and the draft Resource Management Plan must include an adequate evaluation and consideration of the management of the adjoining national forest lands and the needs of the public for motorized recreational opportunities on public lands.

Issue:

2 The typical use of public lands and the typical needs of the public in our region are described on Table 2-7 in the Social Assessment of the Beaverhead-Deerlodge National Forest dated October 2002 (http://www.fs.fed.us/r1/b-d/forest_plan/revision/reports_documents/social/Forest%20Social%20Assessment%20Masterfinal%20.pdf). This document reported that the total number of forest visitors in Forest Service Region 1 for year 2000 was 13,200,000. The total number of wilderness visits was estimated at 337,000 or 2.55% [3]. Therefore, millions of visitors to public lands (nearly all at 97.45%) benefit from

[3] It is revealing that this report chose to present and emphasize wilderness visits which were the minority statistic at 2.55% and ignore the fact that the overwhelming majority of the visitors (97.45%) are multiple-use and, therefore, the

Responses

O3-1: Initial steps in the planning process for this RMP included coordination of various issues with adjacent national forests.

O3-2: Please see response O3-45.

Comments

O3 (Cont.)

management for multiple-use and benefit from motorized access and mechanized recreational opportunities which are consistent with our observations of visitors enjoying motorized access and mechanized recreation on public lands.

An important note, agency planning staff has overlooked one important aspect of the visitor use data. The visitor use data cited above is based on a percent of the total population. However, the percent of the total population visiting our public lands is a fraction of the total population. Public lands should be managed for those people that actually visit them. We request that this adjustment be made in this evaluation.

The total number of individuals that visit our national forests is about 56 million (personal communication Don English, National Visitors Use Monitoring Program, Forest Service, November 29, 2005). Our total U.S. population is about 286 million (2000 Census Data). Therefore, only about 20% of the total U.S. population visits our national forests.

Forest Service Chief Dale Bosworth recognized the true popularity and magnitude of motorized recreation in his January 16, 2004 speech which stated "Off-highway vehicles, or OHVs, are a great way to experience the outdoors. But the number of OHV users has just gotten huge. It grew from about 5 million in 1972 to almost 36 million in 2000." We agree with the Forest Chief that 36 million is a significant number of recreationists. Additionally, the USDA Southern Research Station
2 has recently validated the growing popularity of OHV recreation in their Recreation Statistics Update Report No. 3 dated October 2004 (http://www.srs.fs.usda.gov/trends/RecStatUpdate3.pdf). This document reports that the total number of OHV users has grown to 49.6 million by the fall 2003/spring 2004. Based on the 2000 estimates OHV and motorized recreationists are about 64% of the population that actually visits the forest (36 million / 56 million).

This is further substantiated on page 9 of a report prepared by National Survey on Recreation and the Environment (NSRE 2000) titled Outdoor Recreation Participation in the United States (http://www.srs.fs.usda.gov/trends/Nsre/summary1.pdf) which asks the question "During the past 12 months. Did you go sightseeing, driving for pleasure or driving ATVs or motorcycles?" The percent responding "Yes" was 63.1% and the total number in millions was estimated at 130.8 million.

Additionally, the Southern Research Station in their report Off-Highway Vehicle Recreation in the United States, Regions and States (http://www.fs.fed.us/recreation/programs/ohv/OHV_final_report.pdf) determined that of the total U.S. population 27.3% participated in OHV recreation and that out of the total population in Idaho 33.5% participated in OHV recreation. The percentage of Idahoans that actually visit our public lands is higher than the national average and is estimated at ½ of the total state population. Based on this estimate, about 67% (33.5% x 2) of the actual visitors to Idaho public lands participate in OHV recreation.

These surveys and data demonstrates the significant popularity of motorized and OHV recreation and the tremendous public support and need for motorized and OHV recreational opportunities. We

greatest need is for multiple-use recreational opportunities. This is an example of a predisposition in the presentation of the facts that has crept into the entire process.

O3 (Cont.)

maintain that motorized recreationists are the main group of visitors out of the total population of visitors to the national forest visiting the forest 5 or more days per year. The needs and support of
2 motorized recreationists must be adequately addressed in this planning effort by preserving all reasonable existing motorized recreational opportunities. This planning effort must also adequately address the increasing popularity by creating new motorized recreational opportunities.

Issue:
Access to and use of public land should be the highest of priorities for multiple-use lands. However, current decision-making is out of touch with these priorities. The minority interests (non-motorized recreationists) are recipients of new recreational opportunities with each decision while the majority interests (motorized recreationists) lose opportunities with each decision.

The evaluation and decision-making must take into account that the total area of designated
3 wilderness and non-motorized areas in Idaho versus the total area truly open to motorized recreationists. Every multiple-use acre must remain available for multiple-uses in order to meet the needs of over 90% of the public who visit public lands in Idaho for multiple-uses. Every reasonable multiple-use acre must remain available for multiple-uses in order to maintain a reasonable balance of opportunities. The proposed plan does not meet the basic needs of the public for multiple-use opportunities, a proper allocation of multiple-use recreation opportunities and the laws requiring multiple-use management of these lands. These are serious and significant deficiencies surrounding the proposed plan and we ask that adequate corrective action (a revised alternative analysis and plan) be taken quickly to address these issues.

Issue:
Additionally the decision must consider that non-motorized recreationists have the opportunity to go
4 not only to designated wilderness areas but anywhere while the opportunities for motorized recreationists are limited to designated routes in a small portion of multiple-use areas.

Issue:
The current allotment of recreation resources on all Forest Service lands is way out of balance with 44,919,000 acres out of 192,300,000 acres or 24% in wilderness designation while no more than 2.55% of the visitors are wilderness visitors. The same comparison for BLM managed lands should
5 be disclosed and adequately considered in the Coeur d'Alene Resource Management Plan.

If Roadless acres are included in the Forest Service total, it becomes even more unbalanced with at total of 103,437,000 acres or 54% in wilderness or roadless designation while only 2.55% of the visitors are wilderness visitors.

Issue:
Additionally, specific NVUM data for the Idaho Panhandle area which are represented by the Kootenai NF shows that there were 1,489,000 total site visits to the forest and only 19,000 wilderness visits (http://www.fs.fed.us/recreation/programs/nvum/revised_vis_est.pdf). Therefore,
6 wilderness visits in the Idaho Panhandle area are only about 1.28% of the total visits. The proposed Coeur d'Alene Resource Management Plan must provide a proportionately large and an increased number of recreation opportunities for multiple-use and motorized visitors and a lesser number for non-motorized users.

Responses

O3-3: BLM has presented a reasonable and viable range of alternatives. The preferred alternative makes every attempt to provide a balance between the needs of various user groups, including OHV users. Managing for multiple uses includes taking into account the needs of a large variety of recreational users, wildlife needs, water, soil, and vegetation quality, and commercial needs.

The issue you described is the number one planning issue identified for this RMP. The change in total area available for motorized use (i.e. not designated as closed) ranges from 96,608 acres (99.8% of the BLM-managed land in the planning area) under current management, to 96,139 acres (99.3% of BLM-managed land) under the Preferred Alternative. Thus land where motorized recreation is allowed is only reduced by 0.5% in the Preferred Alternative. All of the added closed areas are either ACECs, or sites where mine tailings would present a health hazard to users. No areas where motorized recreation is currently allowed were closed under any alternative to allow for non-motorized recreation.

The FLPMA definition for multiple use includes "the use of some land for less than all of the resources." Thus every acre does not need to be open to every use, to be considered managed under multiple use.

Also, please see response to O3-124.

O3-4: Please see response O3-124.

O3-5: Table 1 4.3.6-1 clearly compares areas available for motorized use and management designations under each alternative. The change in total area available for motorized use (not designated as closed) ranges from 96,608 acres (99.8% of the BLM-managed land in the planning area) to 96,139 acres (99.3% of BLM-managed land). Thus land where motorized recreation is allowed has only been reduced by 0.5% in the Preferred Alternative. Almost all of the added closed areas are sites where mine tailings would present a health hazard to users.

O3-6: Please see responses O3-124, paragraph 1, O3-45, and O3-75.

Comments

O3 (Cont.)

Issue:
In addition to the studies cited above, we have observed that 96% of the visitors to multiple-use areas are enjoying multiple-use activities based on motorized access and motorized recreation.

TOTAL ANNUAL OBSERVATIONS ON MULTIPLE-USE PUBLIC LANDS — 13-Nov-05

Date	Motorized Access (Note 1) Vehicles	OHV/Snow	FWD/WoodC	MTN Bike	Equestrian	X-C Skiers	Hikers	General Area/Comments	Trailhead (Note Hiking Vehicles at	National Forest
1999	5	342	37	11	10	0	25	See specific years and notes below	0	
2000	11	223	49	26	3	7	15	See specific years and notes below	0	
2001	433	425	58	28	36	3	12	See specific years and notes below	15	
2002	626	499	87	72	23	7	23	See specific years and notes below	48	
2003	904	651	17	66	18	10	27	See specific years and notes below	26	
2004	869	571	62	21	13	19	11	See specific years and notes below	35	
2005	1,322	847	89	38	29	6	20	See specific years and notes below	80	
Column Total	4,170	3,558	399	262	132	52	133		202	
								Total Observations on Multiple-Use Lands: 8,706		
			Mechanized Total	8,389	Non-mech Total		317			
			Mechanized %	96%	Non-Mech %		4%			

Note 1: Motorized access counted as vehicles being used for **fishing only** in 1999. Counted as vehicles (not occupants) which under-estimates actual motorized visitors.
Note 1: Motorized access counted as vehicles being used for **fishing and hunting only** in 2000. Counted as vehicles (not occupants) which under-estimates actual motorized visitors.
Note 1: Motorized access counted as vehicles being used for fishing, hunting, sightseeing, picnicing, dispersed camping, rock climbing, and wildlife viewing not counted in other categories from 2001 forward. Counted as vehicles (not occupants) which under-estimates actual motorized visitors.
Note 2: Vehicles at hiking trailhead from 2001 forward are shown to demonstrate magnitude of uss but are not counted because they are not visiting multiple-use lands.

7

Our observations of recreationists on multiple-use public lands from 1999 through 2005 is summarized in the table above (yearly data sheets available upon request) and demonstrates that out of 8,706 observations, 8,389 recreationists or 96% of the visitors were associated with multiple-uses that involved motorized access and/or mechanized recreation. The agency does not observe visitors on weekends and holidays and consequently is unaware of actual visitor usage. The agency simply needs to go out and count the different recreationists and mode of access on multiple-use lands on any weekend. This is what we have done and our data is an accurate representation of actual visitor usage on multiple-use lands.

Therefore, nearly all (95 - 97.45%) visitors to public lands benefit from management for multiple-use and benefit from motorized access and mechanized recreational opportunities which are consistent with our observations.

Therefore, over 96% of the public land should be managed for multiple-uses including motorized access and mechanized recreation. However, over 50% of the public land is managed by wilderness, wilderness study area, national park, monument, roadless, non-motorized area, wildlife management, and other restrictive management criteria that eliminates most or all motorized access and motorized recreation. Note that the Final Roadless Rule published on January 5, 2001 (http://roadless.fs.fed.us/documents/rule/roadless_fedreg_rule.pdf) included the following directive "The proposed rule did not close any roads or off-highway vehicle (OHV) trails". The agency must honor this commitment.

O3 (Cont.)

7 Therefore, all (100%) of the remaining public lands including roadless areas must be managed for multiple-uses in order to avoid further contributing to the excessive allocation of resources and recreation opportunities for exclusive non-motorized use.

Issue:
8 We are very concerned that a built-in bias exists with visitor use monitoring data based on the fact that all wilderness visitors must sign-in in order to visit a wilderness area and at the same time there are no self-reporting opportunities for multiple-use visitors. Therefore, multiple-use visitor data does not exist or is under-stated.

Issue:
9 The process used puts the average working class citizen at a great disadvantage. The process is inordinately confusing, cumbersome and intimidating to the members of the public who are not organized or experienced which is the majority of the public. The process is inordinately demanding of participation and has unreasonable expectations for the involvement of individuals and families. A 600+ page draft resource management plan with appendices and maps is too much for the general public to understand and participate in. Coupled with the current number of other ongoing actions shown in Table 2 the situation is overwhelming. The size of the DEIS document is being used as a mechanism to overwhelm the public and allow the agency to effectively ignore the needs of the public for motorized access and motorized recreation. Council on Environmental Quality regulations for the proper implementation of NEPA can be found at http://ceq.eh.doe.gov/nepa/regs/ceq/toc_ceq.htm . Sec. 1502.7 Page limits. *The text of final environmental impact statements (e.g., paragraphs (d) through (g) of Sec. 1502.10) shall normally be less than 150 pages and for proposals of unusual scope or complexity shall normally be less than 300 pages.*

Issue:
10 On top of the shear volume is the fact that the document does not address the significant issues affecting motorized recreationists. Just because the public eannot digest all of this paper or understand the process does not mean that the agencies are free to ignore the needs of the public. NEPA never intended for the process to take away the quality of human life for individuals and families but because the process is so overwhelming it is doing just that. Given these conditions, it is not reasonable to expect the level of unorganized public and working class citizen participation to be high. Given these conditions, the needs of the overall public must be carefully determined. The most equitable alternative to meet the public's needs would be a reasonable multiple-use alternative.

Issue:
11 The results from most visitor use surveys do not directly or adequately reflect the importance of motorized access and mechanized recreation to the typical visitor to public lands. The importance and magnitude of motorized access and mechanized recreation is hidden and dispersed within a number of different categories including: viewing wildlife, birds, fish, etc. (motorized access); picnicking (motorized access); viewing natural features (motorized access); hunting (motorized access); fishing (motorized access); general/other (motorized access and mechanized recreation); driving for pleasure on roads (motorized access and mechanized recreation); hiking or walking (motorized access to trail heads); gathering mushrooms, etc.(motorized access); camping (motorized

Responses

O3-7: Thank you for the information. The Forest Service rule cited does not apply to the BLM. Instead, please refer to 43 CFR 8340. The BLM used "roadless' as a criterion during the wilderness inventory process in accordance with the FLPMA. However, the BLM carries out no "roadless area" management outside of designated WSAs. Consequently, the BLM does not use the term "roadless area" as a land classification or as a specific designation similar to how the Forest Service does.

O3-8: The BLM manages no wilderness within the planning area. Please see response O3-129.

O3-9: BLM combines the NEPA and land use planning processes. A Draft and Final EIS for an RMP is typically lengthy because each alternative is a separate management plan for all of the public lands and resources managed by the specific BLM office. This is much different than NEPA documentation for a site-specific project.

O3-10: The preferred alternative makes every attempt to provide a balance between the needs of various user groups, including OHV users. Managing for multiple uses includes taking into account the needs of a large variety of human uses, wildlife needs, and commercial needs. All groups are given an equal opportunity to be involved in the planning process, including during the public scoping process and the public comment period.

The issue you described is the number one planning issue identified for this RMP.

O3-11: Thank you for your comment.

Comments

O3 (Cont.)

11 access); resorts (motorized access); visiting historic and prehistoric sites/areas (motorized access); nature study (motorized access); off-road vehicle travel (motorized access and mechanized recreation); downhill skiing (motorized access); cross-country skiing (motorized access); primitive camping (motorized access); backpacking (motorized access); visiting a nature center, etc. (motorized access); snowmobile travel (motorized access and mechanized recreation); motorized water travel (motorized access and mechanized recreation); other motorized activities (motorized access and mechanized recreation), horseback riding (motorized access); bicycling (motorized access and mechanized recreation); non-motorized water travel (motorized access); and other non-motorized activities (motorized access).

Issue:

12 Allowing travel up to 300 feet off of a designated route, both roads and trails, is an absolutely necessary opportunity for reasonable use of the area by the public. This access is needed for retrieval, woodcutting, and to reach dispersed campsites and the public's use of the area would be unreasonably compromised without this access. The use of this access can be qualified to restrict it in situations where it results in unreasonable resource damage.

Issue:

13 It is our understanding that dispersed campsites are proposed for closure. These are very desirable camp sites. Closure of these sorts of dispersed campsites would have a very significant impact on the public and we request that they remain open. If water quality concerns are the basis for these closures, then there are reasonable alternatives to mitigate these concerns, such as allowing only self-contained camping units to use them. Additionally, a sense of magnitude needs to be applied when assessing the water quality impacts from camping. For example, it appears that cattle grazing along the stream have a much greater impact than any camp site that we observed. Now don't get us wrong, we support all reasonable multiple-uses of the forest including cattle grazing. We are concerned that the incremental impacts on the public of closing dispersed camp sites are relatively significant while the real improvement to the environment will be relatively insignificant. Again, we request that all reasonable camp sites located along water courses remain open.

Issue:

14 If dispersed camp sites are to be closed based on water quality concerns, then we request that the decision include a water quality monitoring program to establish the baseline water quality prior to the closure of dispersed camp sites and continue that program after the closure to establish whether any significant water quality improvement was realized. The decision should also include a provision to re-open closed camp sites when no significant improvement in water quality was realized by the closure.

Issue:

15 In general there is a very high demand for camp sites and especially dispersed camp sites. If a dispersed camp site is closed, then we request that the closure be mitigated by creation of new camp sites on at least a 1:1 basis in order to avoid a significant cumulative effect on the public of too few camp sites.

Issue:

O3 (Cont.)

16 We are very concerned that the proposed plan tends to manage the forest as a national park and not as a national forest where multiple-use opportunities are sought in order to adequately meet the needs of the public. There is no mandate from Congress or the public to manage the project area as national park yet the proposed plan seeks to do that. We request that the project area including the semi-private areas, continue to be managed for multiple-use including motorized recreation.

Issue:

17 We are concerned that comprehensive inventories of existing routes has not been completed. Comprehensive inventories must also include all historic mining routes in the project area. If a motorized route is not identified during the combination of forest and travel planning, then it will be closed to the public at the end of those two processes. Therefore, comprehensive inventories are extremely critical and this is a significant issue.

Issue:

18 Timber harvests have included many motorized closures as associated actions. Many timber harvests have had associated motorized closures that were done without adequately addressing the impact on motorized visitors. Many of these motorized closures were done as a cuncession to those opposed to the timber sales and without input from motorized recreationists. Many of the closures and obliterations included historic travel ways used for exploration, mining, and travel since the pioneer days. Planning actions must adequately address these impacts and re-open the routes that were unfairly closed.

Issue:

19 Forests are a renewable resource and impacts associated with cutting units are relatively short-lived. Therefore, motorized routes that were closed due to timber harvests should be reopened (returned to pre-harvest condition) now because the vegetation and cover has been reestablished. However, most of the motorized closures associated with cutting units have been long-term. All forest planning and travel management planning actions must now evaluate all past motorized closures including road and trail obliterations done to mitigate wildlife security concerns as part of timber harvest. It is logical and fair that once the harvest area has been re-vegetated, then the motorized closures must be lifted. Additionally, the cumulative negative impact of these types of closure actions on motorized access and recreation must be adequately evaluated and mitigated by this action.

Issue:

20 The impact of OHV recreation on wildlife has been incredibly overstated by the agency and wildlife biologists. First, wildlife populations are at all time high (http://www.mtstandard.com/articles/2005/11/30/outdoors/hjjeiigijcefjb.txt) at the same time when OHV use is increasing. If there is any impact to be identified, it appears that it should be that the positive impact associated with increasing OHV use and increasing wildlife populations. Secondly, OHV use does not kill wildlife. Wildlife coexists just fine with OHVs. This was recently confirmed again by a study in Yellowstone Park which found that "Most elk, bison and trumpeter swans barely reacted last winter to the presence of snowcoaches and snowmobiles in Yellowstone National Park, according to a study released Tuesday. Scientists watched more than 2,100 interactions between over-snow vehicles and wildlife last year to try to determine how they responded. Of those, 81 percent of the animals had no apparent response or they looked and then resumed what they were

Responses

O3-12: Your suggestion may be appropriate in some areas but not in others. The BLM prefers to evaluate such implementation level actions on a more site specific basis through activity planning.

O3-13: No camp sites are proposed for closure.

O3-14: Thank you for your comment.

O3-15: Thank you for your suggestion. Please see response O3-13.

O3-16: The alternatives propose multiple use management of BLM-administered lands in the planning area, in accordance with FLPMA, 43 CFR 1610, and BLM Policy. BLM does not manage national forests or private lands.

O3-17: BLM used existing inventory data, staff knowledge, and consulted with local user groups to identify routes for potential designation.

O3-18: The planning of individual timber sales is an implementation action not addressed in the RMP. The BLM is not aware of unfairly closed routes on BLM managed lands in the planning area.

O3-19: Thank you for your comment. Please see response O3-18.

O3-20: Increasing development and use of roads, including both forest roads and highways, stand out as primary factors affecting carnivores. Increased human access to remote areas can result in higher mortality from hunting, illegal killing, and accidental deaths among many carnivores. Highways also act as significant barriers to movements for some species, although the impacts of roads and other barriers to animal movements are not well documented in ways that improve understanding of carnivore population dynamics. Reduced development, closure after use, and management of roads in forest and riparian environments are critical to carnivore conservation. Large carnivore populations have difficulty persisting when road access and interactions with people exceed threshold levels. Studies of wolves and grizzly bears suggest that reducing the number of roads in forest environments is important to the maintenance of normal habitat use patterns and to lower human-caused mortality (Witmet GW, Martin SK, Sayler RD. 1998. Forest carnivore conservation and management in the interior Columbia basin: issues and environmental correlates. Portland OR: USDA Forest Service, Pacific Northwest Research Station. General Technical Report PNW-GTR-420. 49 p.).

Various road-associated factors negatively affect habitats or populations of most of the 91 species of focus. Effects of road-associated factors can be direct, such as habitat loss and fragmentation because of road construction and maintenance. Effects also can be indirect, such as displacement or increased mortality of populations in areas near roads in relation to motorized traffic and associated human activities. Because of the high density of roads present across large areas of the basin, effects from road-associated factors must be considered additive to that of habitat loss. Moreover, many habitats likely are underused by some species due to the effects of roads and associated factors; this may be especially true for species of carnivorous mammals, particularly gray wolf and grizzly bear (Wisdom MJ, Holthausen RS, Wales BC, Hargis CD, Saab VA, Lee DC, Hann WJ, Rich TD, Rowland MM, Murphy WJ, Eames MR. 2000).

(continued on the following page)

Responses
(Continued from Previous Page)

O3-20 (Cont.): Source habitats for terrestrial vertebrates of focuc in the interior Columbia basin: broad-scale trends and management implementations. Portland OR: USDA Forest Service, Pacific Northwest Research Station. General Technical Report PNW-GTR-485. 3 vols.)

The Idaho Department of Fish and Game (2006 Big Game Seasons, p. 13; http://fishandgame.idaho.gov/cms/hunt/atv/issues.cfm; and http://fishandgame.idaho.gov/cms/hunt/atv/facts.cfm.) offers the following: Roads that are open to motor vehicles increase access into big game habitat and as a result the number of hunters increases. Generally, the number of hunters in an area is directly related to the number of roads.

The combination of more hunters and increased mobility of hunters in roaded areas increases the vulnerability of deer and elk to harvest. Deer and elk living in a heavily roaded area are more likely to be killed during the hunting season and for that reason these areas have fewer old bulls or bucks. It also means that hunting seasons have to be shorter to prevent over harvest.

Research shows that slow moving vehicles on primitive roads and trails are more disturbing to elk than fast moving vehicles on highways. Slow moving vehicles traveling cross country have the same effect. Deer and elk often flee from the sound of motor vehicles and may leave the area.

The number of ATVs in Idaho has increased five-fold since 1994; in 2005 over 90,000 off highway vehicles were registered in the state. Most people who own ATVs use them for hunting.

Conflict is occurring where ATVs have increased access into areas that were lightly used in the past. Conflicts also occur because some people specifically select areas that are closed to motor vehicles for hunting and are upset when these rules are violated by others.

Cross-country travel with motor vehicles can create a network of new travel ways that cause erosion, spread noxious weeds, and damage fish and wildlife habitats. Much of this cross country travel occurs during the hunting season.

To reduce these impacts, Idaho's land and wildlife managers ask all hunters using motorized vehicles to stay on roads and trails and use designated routes where they're established. Do not travel cross country with a motor vehicle.

Comments

O3 (Cont.)

doing, the study said" (http://www.helenair.com/articles/2005/12/14/montana/a10121405_04.prt and http://www.nps.gov/yell/technical/planning/winteruse/plan/reports/winterrec05.pdf).

20 It appears that the disturbance of wildlife by OHV issue including wildlife corridors is being fabricated to further the conversion of multiple-use lands to non-motorized lands. The agency is encouraged to avoid road and trail closures based on wildlife concerns except where negative wildlife impact can be specifically identified and documented. Motorized use on existing trails has little or no verified effect on game animal welfare (see additional references provided in later sections). In fact, areas that have been more intensely visited by motorized visitors have experienced significant increases in wildlife populations; further substantiating the fact that motorized recreation does not create a significant impact on wildlife.

Issue:

21 It is our understanding that some interests are pushing the wildlife corridor concept as a reason to close areas to motorized use. We have not seen adequate documentation or reasoning to justify this position and suspect that it is being used inappropriately as a reason to justify defacto wildemess by non-motorized interests. Significant issues must be answered before this concept can be given any credibility. Issues include:

1. Why would wildlife follow physically challenging basin divides where food and water is scarce versus other corridors? They don't. This is easily verified by open areas such as McDonald Pass or the jagged areas of the continental divide where we have never observed any significant number of wildlife crossings versus great numbers of wildlife crossings that we have observed in other areas that are more favored by wildlife.
2. Where is the documentation that the continental divide or other basin divides are favored for wildlife migration? Especially theories that purport that wildlife will migrate from Mexico to Canada. This is counter-intuitive to the types of habitat that different species require in order to survive. There is a significant lack of credible evidence to support these claims.
3. The lack of authorization or mandate from congress.
4. The socio-economic issues associated with the attempt to use the wildlife corridor concept to convert multiple-use lands to defacto wilderness.

Issue:

22 While Revised Statute 2477 was repealed by the 1976 National Forest Management Act, the revision clearly stated in the Act was to insure that no new roads from the effective date of the Act would be considered for RS 2477 consideration. It further clarified the historical highways would be honored. That is all that the Act modified or repealed.

Recently, Utah Counties were challenged in court for their actions similar to the challenge at Jarbidge Road in Nevada. The foundation in both cases is the fact that the Counties even without a charter form of government have the authority to exercise rights afforded to them by the federal government. Until the federal government completely repeals the 1866 Act, (Revised by the 1872 Act) in its entirety the citizens of the United States still have the right to access lands for the benefit of the people of the United States. The recent decision rendered by the 10th circuit re-affirms this (http://www.kscourts.org/ca10/datefile/datefile.htm look under 9-8-2005, and then 04-4071 - Southern Utah Wilderness Alliance v. Bureau of Land Management).

O3 (Cont.)

22 The court has ruled that the rights exercised by the counties would be valid if the routes in question were indeed 2477 classified. The county has records that show that the routes were there prior to the establishment of the 1976 NFMA and FLPMA and, are therefore, valid RS 2477 routes. Additionally, it is the responsibility of the agency proposing a closure action to adequately research those records and establish which routes meet RS 2477 classification and then consult and coordinate with the County with respect to that classification. We request that this planning project include adequate research of the county records and adequate formal consultation and coordination with the county to get their input on RS 2477 routes.

Issue:

23 Every planning action "re-invents" the line weights, color, and line styles for the different motorized and non-motorized road and trail designations. This is very confusing to the public and, once again, puts motorized recreationists at a disadvantage. A national mapping standard for travel planning actions must be developed starting with proposed action in order to address this inadequacy and environmental justice issue.

Issue:

24 Road decommissioning funds should be used instead to maintain motorized trails. We suggest that this expenditure would benefit the public and environment in a more positive way and have a more positive environmental impact.

Issue:

25 We are working hard to convince OHV recreationists to "tread lightly". We have been informed that trails were closed because they "saw very little motorized use" as part of the BLM Sleeping Giant Travel Plan and Mormon Gulch timber harvest in the Beaverhead-Deerlodge National Forest. These actions would suggest that we should "power on" so that our tracks and usage are obvious. We think that it sets a bad precedent to close a route because it appears to see little use. It is not fair that motorized recreationists practice "tread lightly" principles and are then penalized for following that practice. Additionally, forces including cattle grazing, horses and wild animals, and rain quickly obliterate motorcycle tracks. We observed this condition again recently when the tracks of 7 motorcyclists that we observed using a single track trail were quickly erased with one light rain shower.

Issue:

26 If light use is being used as a criterion to close motorized routes, then it would also seem fair to convert non-motorized trails that see light use to motorized routes in order to address the concern of over-usage and shortage of motorized routes. We ask for your consideration of this reasoning.

Issue:

27 Because of the cumulative negative effects of the motorized closure trend, the recreational opportunities for motorized recreationists is dramatically being reduced to a limited number of motorized routes and the lesser used routes are becoming hard to find and, therefore, they must be considered invaluable to motorized recreationists. The level of use should also be evaluated along the logic that the most valuable motorized routes now days are the ones that are remote and see less use. Therefore, barely visible 2-track roads and single-track trails are invaluable to motorized

Responses

O3-21: Servheen, Waller, and Sandstrom (2001, Identification and management of linkage zones for grizzly bears between the large blocks of public land in the northern Rocky Mountains, US Fish and Wildlife Service) and the draft EIS for the Northern Rockies Lynx Amendment (2004) identified important travel corridors for grizzly bears and Canada lynx. Many of these travel corridors in northern Idaho do not have BLM public lands within them.

Much of the BLM public lands in northern Idaho do not have many physically challenging basin divides. Mountain goats and collared pikas inhabit these areas, but the BLM is unaware of any goats occupying public lands. Collared pikas, however, do inhabit some of these lands.

Rounded ridgelines have gentler slopes for easier travel than traversing up-and-down side slopes.

Animals that migrate between Mexico and Canada usually fly and they use mountains and valleys for navigation.

O3-22: See Chapter 1, Page 1-8, Planning Criteria 1.5.4 "The RMP will recognize all valid existing rights."

O3-23: The travel management maps are standardized in appearance to comply with BLM cartographic standards. Line weights, styles, etc. are the same on all maps.

O3-24: Thank you for your comment.

O3-25: Thank you for your comment.

O3-26: Thank you for your comment.

O3-27: Thank you for your suggestion. Please see responses O3-124 and O3-45.

Comments

O3 (Cont.)

27 recreationists and must be evaluated as such. Motorized recreationists are struggling to keep a reasonable spectrum of opportunities available and one piece of that spectrum are remote and lesser used routes. In a constantly losing scenario, every remaining motorized recreational opportunity is important to motorized recreationists.

Issue:

28 We were again reminded recently of the cumulative effects of all forms of closures that are impacting motorized recreationists. We recently visited a site in the Flint Creek Range that we have been visiting for years. In the past there has only been 1 other group camping in this area. This past weekend there were over 15 groups (over 100 motorized recreationists) camping in the area and most of them were from Missoula (70 miles one-way). When we asked some of them why they chose this area they responded that they did not have any where else to go in the immediate Missoula area and that the word was out on this particular area. This is happening in too many places and in the end the current closure trend will concentrate everyone in a few locations. We believe, that in the end, the current motorized closure trend will produce an undesirable experience for the forest visitor and for the environment. We respectfully submit that the current management trend of motorized closures at every opportunity is not in the best interest of the public and the environment in the long-term.

Issue:

29 The proposed action must not result in a disparity in the quantity of motorized recreational opportunities versus non-motorized recreational. The proposed action also must not result in a disparity in the quality of motorized recreational opportunities in comparison non-motorized recreational opportunities. Equal access laws also apply to motorized recreationists and provide for equal access to both an equal level of opportunities and an equal quality of opportunities. Our laws do not give non-motorized recreationists priority over motorized recreationists. Our laws also set the precedent that public facilities must be reasonably shared with one another.

Issue:

30 Motorized closures are being enacted incrementally and without adequate disclosure and consideration of the cumulative effects. Travel plans are created or revised every 10 years. If 25 to 50% of the existing motorized recreational opportunities are closed in each successive travel plan (a typical range), then over the course of 3 travel planning cycles or about 30 years in a given area, only 13 to 42% of the original motorized recreational opportunities will remain at the end of the third cycle. This trend is being ignored at all levels including the actions listed in Table 2. The plan for this project area does not recognize and address this trend. The draft Resource Management Plan for the Coeur d'Alene area does not adequately recognize and address this trend. The national planning policy does not recognize and address this trend. Therefore, this cumulative effect is being effectively ignored and that failure to notice will result in the ultimate loss of any meaningful motorized recreational opportunities and the creation of defacto wilderness from large blocks of multiple-use lands. We ask that this significant negative cumulative effect on motorized recreationists be adequately recognized, evaluated and mitigated at all levels starting with this project.

Issue:

O3 (Cont.)

31 The project cannot be a success without a clear statement of the owners and the objective for the travel plan project. The owners of the travel plan project must be identified as the end users of the project, i.e. all of the public that relies on the project area for motorized access and recreational opportunities. The objective for the project should be "To meet the needs of the public for a functional network of motorized roads and trails for access and recreation with practical and reasonable consideration of the environment".

Issue:

32 Current planning projects typically add the number of miles of motorized trails closed to the current miles of non-motorized trails as a measure of the change in non-motorized recreational opportunity. However, current planning projects do not add the miles of roads closed by action to the miles of non-motorized trails. Non-motorized recreationists use roads that are closed and benefit from them because closed roads; are open to use by only non-motorized recreationists, are typically clear and easy to walk and bicycle, are covered with natural vegetation within a relatively short time and are quickly used as trails. When roads are closed to motorized recreationists, then they in reality become a non-motorized recreational resource and they must be disclosed as such.

33 Unfortunately this procedure has not been practiced to date and the miles of recreational resources have been understated in favor of non-motorized recreationists. All planning projects should disclose the added benefit to non-motorized recreational resources resulting from the closure of roads by adding the miles of closed roads to the miles of existing non-motorized trails. We request that this procedure be used by this project and all future agency projects. Additionally, we request that the cumulative negative impact on motorized recreationists resulting from this lack of adequate accounting be evaluated and adequately mitigated.

Issue:

34 The unstated but obvious goal or policy of the agency is to close as many recreational resources to motorized recreationists as possible. The trend to date of overall recreational opportunities (sum total) for motorized recreationists is a large negative amount. This cumulative effect is forcing motorized recreationists into a smaller and smaller resource base. The ultimate outcome of this unstated goal or policy will result in unreasonable impacts to both the natural and human environments. It is also an unreasonable policy or goal with respect to fair and equal treatment of motorized recreationists.

35 Environmental impacts are not unreasonable under the current conditions but environmental impacts will become unreasonable given the agency's current direction to close as many motorized recreational opportunities as possible and that divide will be crossed soon. Therefore, agency management actions are ultimately creating significant unnecessary negative impacts on both the natural and human environment. We are concerned that this unstated goal or policy is not in the best interest of protecting the natural or human environment and ask that goals and policies hy modified to allow the public continued use of all reasonahle access and recreational opportunities on all multiple-use lands.

Issue:

36 Agency planning including travel management projects should be a process to quantify and address the needs of the public for motorized access and motorized recreational opportunities. Instead, it is

Responses

O3-28: Please see response O3-124.

O3-29: Please see response O3-124.

O3-30: Please see response O3-124.

O3-31: Thank you for your comment.

O3-32: Thank you for your suggestion. Please see response O3-124.

O3-33: Thank you for your suggestion. Please see response O3-124.

O3-34: Thank you for your comment.

O3-35: BLM has no such unstated goal.

O3-36: Thank you for your suggestion. Please see response O3-124.

Comments

O3 (Cont.)

36 approached in just the opposite direction as a closure process that ignores the needs of the public for motorized access and motorized recreational opportunities. Every travel planning process listed in Table 2 has reduced motorized access and motorized recreation. A travel planning process has never resulted in increased recreational opportunities for motorized recreationists. The travel management process as currently practiced is not equitable because: (1) it does not adequately address the needs of the public for multiple-use recreational opportunities including motorized access and motorized recreation, and (2) it is deceptive to represent the process as a travel management process that will address the needs of the public when it is really just the opposite, i.e., a closure process that does not fairly and adequately address the needs of the public. We request that the process either he renamed to "Travel Closure Process" in order to end the deception of the public **OR** (as we strongly prefer) that the process be redirected to meet the needs of the public for a functional network of motorized roads and trails for access and recreation with practical and reasonahle consideration of the environment.

Issue:

37 Idaho's Trail Ranger program combined with cooperative management of National Forest lands provide over 9,000 miles of trail riding opportunities (http://www.idahoparks.org/rec/rangerJ.html). This is provided as an example of the level of OHV programs and recreational opportunities that motorized recreationists need in each state and we ask that this project adopt a similar goal.

Issue:

38 The starting alternative proposed to eliminate motorized access and motorized recreational opportunities without first adequately addressing the needs of the public for motorized access and motorized recreation and without proper evaluation of facts and information. This procedure is evidence of a significant predisposition in the process.

Issue:

39 The negative social and economic impact experienced by motorized recreationists when motorized recreational opportunities do not exist in nearby public lands must be adequately evaluated and considered in the decision-making. This is especially significant now that fuel is over $2.00 per gallon. These impacts include the complete loss of recreational opportunities and the cost of having to travel farther and farther in search of fewer and fewer motorized recreational opportunities in times of increasing travel costs. For example, the lack of adequate OHV systems in the Helena National Forest requires us to travel at least 180 miles to adjacent national forests. A 180 mile roundtrip costs at least 3 hours and $70 and that cost will increase substantially in the future. This added cost is a waste of time and energy resources and has not been adequately considered by the agency.

40 Additionally, OHV routes in adjacent forests are being reduced at an alarming rate and are compounding the cost in time and energy even further. We request the evaluation of the economic cost of fewer motorized recreation opportunities on motorized recreationists and the significant cumulative negative effect of all travel management decisions that contribute to these social and economic impacts on motorized recreationists.

Issue:

O3 (Cont.)

41 While we respect other perspectives, one must also realize that the extreme ideals of the environmental groups such as the public should not be able to enjoy and use public lands, that everything should be wild, and that their use is the only reasonable use are not generally acceptable ideals for public policy nor are they supported by the laws. We are practical environmentalists who believe in a reasonable balance between the protection of the natural environment and the human environment and we believe that the laws are intended to support this ideal. Our position is to restore balance, practicality and fairness to the system.

Issue:

42 The existing level of access and motorized recreation is a reasonable starting position and alternative. An even fairer position given that this should be a travel plan seeking to address the needs of the public for motorized access and recreation would be an alternative based on an enhanced level of opportunity. However, a starting position of massive closures is completely unreasonable and tells us a lot about where the process is heading. It seems to be predisposed. This strategy is outrageous because it forces the public to fight to get every inch of motorized road and trail added back into the preferred alternative. This strategy is designed so that motorized recreationists are destined from the outset to lose big time. The damage has been done as we hear many people saying "what's the point of participating, the process is rigged and the Forest Service has already made up its mind". We request that this strategy be corrected by presenting a starting alternative that addresses the need for multiple-use access and recreational opportunities.

Issue:

43 The planning team should formulate an Alternative that maximizes all existing recreational opportunities, as well as anticipates and plans for an increase in recreational use in the future. None of the Draft Alternatives maximize recreational alternatives and most of them fail to provide adequate recreational opportunity to meet the current need.

Issue:

44 The agency must develop a true No Action alternative in compliance with NEPA and other planning regulations. The agency must formulate a lawful "No Action" alternative so that the public and decision makers may reasonable compare and contrast other management alternatives.

A No Action alternative is a vital component in assuring full public disclosure of all foreseeable direct, indirect, and cumulative environmental impacts of the project, and consistency with environmental and public involvement requirements of State and Federal laws, Executive Orders and policies. The twin goals of NEPA (to inform the puhlic and disclose anticipated effects) are not met without a properly written and accurate No Action alternative.

An accurate No Action alternative provides for a clear, logical and comprehensive analysis process and disclosure of effects, both to the human environment and especially in this case, effects to visitors. An aceurate No Action alternative is the prescribed way the agency discloses existing conditions of Federal lands and serves as a baseline for discussion of guidance and rationale for proposed changes to travel management direction and programs for implementation. Under the existing conditions motorized recreationists have a reasonahle number of choices and variation of opportunities. Under most proposed conditions, motorized recreationists have a significantly reduced number and variety of opportunities. We do not want to he forced to go to the same place

Responses

O3-37: Thank you for your comment.

O3-38: Under the no-action alternative, all current OHV designations would continue.

O3-39: Thank you for your suggestion. Please see response O3-124, paragraph 2.

O3-40: Thank you for your suggestion. Please see response O3-124, paragraph 2.

O3-41: Thank you for your comment.

O3-42: Thank you for your suggestion. Please see response O3-124.

O3-43: Please see response 05-20, paragraphs 1 and 2.

O3-44: 43 CFR 1610.4-5 states that "one alternative shall be for no action, which means continuation of present level or systems of resource use." Management actions described under the no-action alternative came directly from the existing MFP and amendments and adequately reflect current management direction, as required by Federal Regulations.

Comments

O3 (Cont.)

44 over and over nor do we want to be squeezed out from public lands. Therefore, the No Action (existing condition) alternative must be accurately and reasonably evaluated.

Issue:
There is an increasing demand for OHV recreation opportunities on public lands. The BLM, Forest Service, as well as environmental groups, state and local governments and OHV and recreational access organizations have all acknowledged that many Land Use Plans woefully failed to anticipate the increased public demand for all types of outdoor recreation and related OHV uses. Additionally, and importantly, the Bureau of Land Management's National OHV Strategy states: "Motorized off-highway vehicle use on public lands administered by the Bureau of Land Management (BLM) has increased substantially in recent years. … Some of [the factors contributing to growing OHV popularity] are:

- greater public interest in unconfined outdoor recreational opportunities;
- rising disposable income …
- advances in vehicle technology
- the rapid growth of the West's cities and suburbs …
- a population with an increasing median age with changing outdoor recreational interests.

This [growing OHV] popularity is evidenced by the fact that recreational enthusiasts are buying OHV's at the rate of 1,500 units per day nationwide, with nearly one-third of them doing so as first-time buyers." "[BLM's OHV] Strategy recognizes, as does policy outlined in BLM Manual 8340 (May 25, 1982), that off-road vehicle use is an 'acceptable use of public land wherever it is
45 compatible with established resource management objectives.' As established by the Federal Land Policy and Management Act of 1976 (FLPMA), the BLM is required to manage public lands on the basis of multiple use and sustained yield, while protecting natural values. … Motorized OHV use is now firmly established as a major recreational activity on BLM-administered public lands".

Unwisely, rather than work to accommodate the increased demand for OHV recreation, BLM and many National Forests have frequently reacted by restricting OHV opportunities. But more importantly, opportunities to manage OHV use by developing OHV trail systems, marking roads and trails, providing usable maps, identifying OHV trails and systems and entering into cooperative management agreements with OHV user groups have, by and large, been ignored by most federal land managers. Although more pro-active management is clearly permissible within the existing management plans, a quick search on the BLM's and National Forest's websites indicates that land managers more often choose to implement parts of their OHV policy associated with limitations and closures.

Suggestions:
a) The agency cannot legitimately address increasing demand for OHV recreation opportunity by refusing to accommodate such demand. Alternatives must prudently provide for increased OHV recreation opportunities to meet current and anticipated demand.
b) The planning team should look to individuals and user groups for assistance in identifying opportunities for OHV recreation.
c) The planning team should develop management alternatives that allow for proactive OHV management. All alternatives should include specific provisions to mark, map and maintain existing

O3 (Cont.)

45 OHV opportunities. All alternatives should include instructions to engage in cooperative management with OHV groups and individuals.
d) Alternatives should include areas where OHV trails can be constructed and maintained when demand increases.

Issue:
When developing management alternatives the agency must recognize the public's desire to keep existing opportunities open.

OHV's are by far the most desired and utilized means to obtain solitude in nature. Most public land visitors strongly favor maintaining exiting roads and trails open to disperse use and address environmental concerns regardless whether or not the road or trail is classified by the agency. The agency must recognize that providing for OHV use and protecting the environment means fully utilizing the inventory of existing roads and trails.

46 Suggestions:
a) The public wants the existing roads and trails left open to vehicle use.
b) The existing network of roads and trails in the planning area should be considered an inventory with which to develop recreational trail systems.
c) The Planning Team should look for management alternatives that provide for mitigation instead of closure. Options other than closure should be emphasized in each alternative.
d) Alternatives, or management guidance, directives etc that require closure as the first or only option when resource impacts are identified should be avoided.
e) The Planning Team should carefully consider displaced use. Assuming that closures are eminent in some areas, one could calculate approximately how much existing motorized will be displaced to other areas. The Planning Team should develop alternatives that allow for additional access and additional recreational opportunities in suitable areas in order to properly manage the displaced use.
f) The Planning Team should avoid overly restrictive management prescriptions that limit the land manager's ability to respond to changing recreational patterns.

Issue:
47 Agency managers seem to be directed to close as much public land as possible to motorized visitors by a top down management directive that is conflicting with the needs of the public for multiple-use access and recreational opportunities and contrary to the laws established by congress. Congress has not designated this area to be wilderness and existing congressional laws clearly intend for this area to be managed for multiple-uses. Why are legally designated multiple-use lands being managed for limited-use instead of multiple-use? The top down closure directive is in violation of the will of the people and in violation of congressional laws.

Issue:
48 Because of the excessive closures proposed, motorized recreationists are forced once again into a confrontational position with the agency in order preserve any sort of reasonable solution. This is not our choice and we are disadvantaged by being placed in this position. We would prefer to work collaboratively with the agency but once again the travel planning process is being approached as a "closure" process. We are concerned that this is a conscious strategy to put motorized recreationists,

Responses

O3-45: Thank you for your suggestions. The BLM recognizes that OHV use on public lands has increased substantially in recent years. Based on the number of comments received on the topic, OHV management has emerged as the major issue being addressed in the RMP. The diversity of opinion on the issue also shows it to be the most contentious.

The proposed action accounts for increased recreation demands by establishing five new Special Recreation Management Areas (SRMA). Lands explicitly managed for recreation would increase from 651 acres to 79,152 acres which represents 82% of the BLM lands in the planning area. Objectives for several of the large SRMAs specifically prescribe management for motorized back-country road and trail activities. Refer to Action RC-D1.1.1 and the area specific objectives and actions that follow.

O3-46: Thank you for your suggestions. Please see responses O3-124 and O3-45, paragraph 2.

O3-47: Thank you for your suggestion. Please see response O3-124.

O3-48: There are no excessive closures in this plan. BLM has worked openly with local motorized recreationists and they have participated in the planning process.

Comments

O3 (Cont.)

48 who are largely unorganized, at a disadvantage. We ask that this concern be adequately addressed and that significant changes be made to the procedures in order to eliminate this disadvantage.

Issue:

49 All of the existing motorized routes are very important resources to us. For example, we have enjoyed trips to project area and these have usually been extended weekend trips that are special events for us. We have ridden over most of the open routes in the project area and have thoroughly enjoyed them but we could not accurately draw lines on a map to describe where we have been and what routes we want to remain open. We are puzzled by this requirement. We have never had to identify and inventory backpacking routes that we wish to remain open. Additionally, most motorized recreationists do not have the expertise or equipment required to provide a comprehensive inventory of roads and trails. We are very concerned about the burden and disadvantage that is placed on motorized recreationists by this procedure and we request that it be changed.

Issue:

50 We are very concerned that motorized recreationists must identify and inventory specific routes that we want to remain open. These resources are there now and they are being used by the public and in almost all cases, it is entirely reasonable type and level of use. Motorized recreationists should not have to identify and inventory motorized routes as part of the process. This is the work of the agency. No other visitor group is saddled with this requirement. Our concern is that the agency is using public involvement in a discriminatory way to establish which motorized routes will remain open. For example, the Forest Service has concluded that the level of use by motorcycles is low based on the level of public participation in the EA process. There is no actual data or comparison of motorcycle use to hiking use or direct discussion with motorized recreationists to substantiate this.

Issue:

51 We respectfully maintain that the agency can not establish the motorized routes to remain open based solely on formal written public input because the process did not have a high enough level of participation by motorized recreationists to develop meaningful input. Therefore, the needs of motorized recreationists are not adequately or accurately represented. Our comments submitted during the EA further explain why this condition exists but basically the process, as practiced, is overwhelming and intimidating to the public. There are ways to more directly involve motorized recreationists including interviews at club meetings and interviews on the trails and at trailheads. Continuing to use the practice of formal written comments to establish the need for motorized routes will leave motorized recreationists with only a few main roads and with no high quality motorized trails. We object to this process and respectfully request that it be corrected. Additionally, the current practice is discriminatory because non-motorized recreationists are not required to submit written formal comments that identify and defend each and every recreational opportunity that they want to enjoy in the future. Again, we respectfully ask that this practice be corrected.

Issue:

52 Similar to non-motorized recreationists, motorized recreationists also like plenty of dispersed recreational opportunities and the current trend is limiting motorized recreationists to a very few locations. Additionally, eliminating dispersed motorized recreational opportunities and

O3 (Cont.)

52 concentrating the few remaining motorized recreational opportunities in relatively small areas significantly increases negative impacts on both the natural and human environments to the point that the impacts become unacceptable and this trend is neither reasonable nor equitable.

Issue:

53 Motorized recreationists endorsed and accepted millions of acres of area restriction under the Off-Highway Vehicle Environmental Impact Statement and Proposed Plan Amendment for Montana, North Dakota and South Dakota (3-State OHV) decision as a positive action to control environmental impacts. We accepted area restriction and not area closure. Area closure is permanent. Area restriction allows flexibility as needed to address site specific conditions. Each motorized road and trail exists because it serves some multiple-use need. Every road and trail is important to some individual for some purpose. Each motorized road and trail must have adequate site-specific analysis to determine all of its values including motorized recreational value. Motorized recreationists gave up 97% of the area covered under both the Forest Service and BLM 3-State ROD as the ultimate mitigation so that we would continue to have use of existing motorized routes that cover or provide access to an area estimated at less than 3% of the total project area. Now we have been given almost no credit for that action and have only been penalized for our past cooperation by current resource management plans, forest plans and travel plans that seek to close 50% to 75% of the remaining routes. This outcome was not part of the 3-State agreement and this level of closure is not acceptable to us for that reason. The 3-State agreement was not made with the intention of massive closures beyond that agreement. We ask that all BLM and Forest Service actions include proper recognition of the agreement behind the 3-State OHV decision that included continued use of the existing networks of motorized roads and trails without massive motorized closures.

Issue:

54 Requiring motorized visitors to identify and inventory roads and trails is seen as part of a strategy to reduce the number of motorized routes because the public cannot undertake this huge effort. Additionally, the 3-State OHV decision required that site-specific planning be analyzed at a number of different scales and across different boundaries. Site specific planning includes an adequate evaluation by the agency of all of the impacts being experienced by motorized recreationists including motorcycle trail riders in both the project area and the surrounding region. The scale and boundaries of impacts being experienced by motorized recreationists are discussed in throughout these comments. Site specific analysis was an important part of the 3-State OHV decision and was discussed many times in that document. The agency should commit the resources and has an obligation to evaluate the needs of OHV recreationists at a least the same level of detail as key wildlife and natural resource areas. Site specific analysis includes adequate identification and inventory of all existing motorized routes and adequate evaluation of the public's need for those routes. An example of adequate site specific analysis to be used as a guideline are the comments dated May 1, 2004 and prepared by John Borg for the Caribou Travel Plan Revision. A copy of these comments can be obtained from the project record for the Caribou Travel Plan Revision or at www.mtvra.com.

Issue:

55 Another example of predisposition in the current setting includes the fact that motorized recreationists endorsed and accepted millions of acres of area closure under the 3-State OHV

Responses

O3-49: Please refer to Chapter 5 for an accurate description of the public collaboration and outreach opportunities that the BLM made available in development of the RMP/EIS.

O3-50: Please see response O3-49.

O3-51: Please see responses O3-17 and O3-49.

O3-52: Thank you for your comment.

O3-53: This settlement does not pertain to lands within the CDAFO.

O3-54: Please see responses O3-48 and O3-53.

O3-55: Please see response O3-53.

Comments

O3 (Cont.)

55 decision as a positive action to control impacts but we have not been given credit for that action and have only been penalized for our past cooperation and initiative. The preferred alternative must adequately consider that past cooperation and it must move in a direction that gives motorized recreationists credit for their cooperation and the environmental improvements that resulted.

Issue:
56 The 3-State OHV EIS and the new National OHV Policy describe the second level of planning involving the analysis and implementation of management practices referred to as "site-specific" planning. Site specific planning detailed information including the location, condition, and current uses of individual roads and trails, and the identification of when and where individual roads and trails will be open or closed to various types of use. We supported the restriction nf cross-country travel because we felt the document assured the identification of on the ground trails and their consideration as designated routes. Currently in Montana, the only forest to conduct an inventory that includes adequate detail and includes trails that are current routes on the ground is the Lewis and Clark National Forest in the Little Belt Range. Adequate site specific planning as outlined above must be provided as part of this project.

Issue:
57 A reasonable test of significance of impacts from motorized closures on motorized recreationists must be used. A reasonable test would include evaluation of indicators including:

1. Where else can motorized recreationists go within a reasonable distance and with equal recreation value?
2. Do motorized recreationists have an adequate selection of the recreational resources with the proposed motorized closure(s)?
3. What is the balance of recreational opportunities in the area and region as demonstrated by the information developed from the outline shown in Table 1?
4. Are the existing motorized recreational opportunities sufficient for the needs of the public?
5. Are there documented user conflict and can the recreational resources be reasonably shared?
6. What are the cumulative effects of this motorized closure combined with all other motorized closures?

Issue:
58 In order to adequately evaluate and disclose motorized and non-motorized recreational resource and opportunity information to the public, the following information using tables and maps must be used and presented in an accurate and concise manner.

Table 1
Comparison of Non-motorized and Motorized Opportunities

1. the miles of non-motorized recreational opportunities available in the project area including all possible cross-country routes and the number of acres available for cross-country non-motorized recreation under the existing condition,
2. the miles of roads and trails and number of acres to be closed to non-motorized recreationists in the proposed condition,
3. the miles of existing motorized roads, atv trails, and motorcycle trails in the project area meeting the 3-States OHV decision definitions,

O3 (Cont.)

4. the acres within the project area open to motorized recreationists under existing and proposed conditions,
5. the percent of motorized and non-motorized recreational opportunities in the project area,
6. the miles of atv trails, motorcycle trails and roads and acres closed to motorized recreationists under both existing and proposed conditions,
7. the cumulative miles of roads, atv trails, motorcycle trails meeting the 3-State OHV definitions and number of acres closed to motorized recreationists over the past 35 years at 5 year intervals in both the project area and regional area.

58

Once this information is adequately and concisely presented, one can easily see that motorized recreational opportunities are limited in the existing condition and then severely reduced in the proposed condition. This information must be presented in order to understand the significant imbalance of recreational opportunities that exists and the decision is deficient without this information.

Issue:
59 The evaluation of a balance of opportunities should also include an accounting and comparison of facilities including trailhead facilities at wilderness areas versus trailhead facilities at OHV areas. Most wilderness trailhead facilities include parking lots, horse handling facilities, kiosks with information, campgrounds, and restrooms and they are funded without any direct connection to the users. Motorized recreationists generate more than adequate gas tax and OHV sticker revenues (over $500,000 in FY 2003 in Montana, FWP OHV program and RTP) but have few facilities to show for it versus a great need for facilities. Additionally, another $311,274 that was designated for motorized programs and that could have been spent on badly needed motorized recreational facilities were instead spent on non-motorized facilities. We request an adequate evaluation and consideration of these imbalances be made part of this project and actions taken that will correct these imbalances.

Issue:
60 The reason often given by the agency that motorized trail projects including those using OHV grant money cannot be undertaken is that there is a current travel planning process under way or one about to begin or that NEPA compliance must be undertaken. There is a continuous cycle of travel planning undertaken and the public is not able to undertake NEPA compliance. The result is that motorized RTP funding is often under-utilized. At the same time, there is a tremendous need to projects on motorized routes. We need to find a way to break this Catch-22 situation.

Issue:
61 Because of the cumulative negative effects of the motorized closure trend, the resource base for motorized recreationists is generally be reduced to a limited number of mntorized routes and the lesser used routes are becoming hard tn find and, therefore, they must be considered invaluable to motorized recreationists. The level of use should be evaluated along the logic that the most valuable motnrized routes now days are the ones that are remote and see less use. Therefore, barely visible 2-track roads and single-track trails are invaluable to motorized recreationists and must be evaluated as such. It is nnt fair that motorized recreatinnists practice "tread lightly" principles and are then penalized for that practice. This is annther example of predisposition.

Responses

O3-56: The 3-State OHV EIS does not apply to Idaho.

O3-57: Please see response O3-124 and the documents there referenced.

O3-58: This RMP has been prepared in accordance with specifications described in BLM's Land Use Planning Handbook (H-1601-1). Documentation at the level of detail requested by the commenter is beyond the requirements for a programmatic planning document such as this.

O3-59: This comment relates to wilderness management, Forest Service and State of Montana issues. All are outside the scope of the RMP.

O3-60: Please see response O3-59.

O3-61: Thank you for your comment.

Comments

O3 (Cont.)

62 Issue:
Throughout this document we may refer to motorcycle trail riders and atv riders as motorized recreationists because the relationship between them are inter-twined. For example, many trails that were once single-track have become atv trails. Additionally, the trend of motorized trail closures affects all OHV recreationists and puts additional demands on the few motorized recreational opportunities that remain. However, motorized single-track trails are a uniquely different resource and experience compared to atv trails and must be recognized as such.

63 Issue:
Existing single-track trails or potential single-track trails were not adequately identified and included in the project. There are many single-track "cow" trails that motorcycle trail riders could use in the project area. It is critical to preserve the integrity of the existing motorized single-track trails. Single-track trails offer a highly desirable experience for trail bike riders, equestrians, hikers, and bicyclists. They offer a different, more primitive experience than ATV trails or forest roads.

64 Issue:
As part of the planning process, the agency is requiring motorized recreationists to provide an inventory of motorized routes that are important to them. It is not reasonable to expect motorized recreationists to inventory all existing motorized access and motorized recreational opportunities that they would like to use over the course of a lifetime. For example, motorized recreationists may be planning to visit an area that is 200 miles away for a week long summer vacation to enjoy motorized routes or we know people from several hundred miles away that routinely hunt in the fall and use many of the primitive roads and trails within the project area. They are not aware of the planning process and, even if they did, would not be able to inventory all of the primitive roads that they use. They simply expect the agency to look after their needs and that these motorized access and recreational resources will always he there for them. They will be extremely disappointed when they go out to their favorite hunting camp and find 50% of the access closed. This is also an example of why the results of travel planning are generally poorly supported by the public.

Under the current process if motorized recreationists are not involved in the planning process for that area they will undoubtedly lose use of one-half of the existing routes and be extremely disappointed when they do visit in the future. Given the significant number of actions as demonstrated in Table 2, it is impossible for motorized recreationists to participate in each action and provide inventories of routes for each action, so motorized recreationists are destined to lose because the agency will not adequately consider our needs unless we provide inventories of routes. Again, a significant predisposition exists because the needs of non-motorized recreationists are given significant consideration without the requirement for inventories and identification of resources, i.e. non-motorized recreationists are not subjected to the same requirement to identify trails now in order to keep them open for future use and generations.

65 Issue:
The amount of use that a route receives is not a criterion for non-motorized routes (see later comment about solitude on CDNST) and should not be a requirement for motorized routes. Solitude, challenging, and remote motorized routes are highly valued by motorized recreationists also.

O3 (Cont.)

66 Issue:
The document and decision must clearly disclose on maps and tables and summaries all existing areas, and existing roads and trails that would be closed to motorized access and motorized recreationists. Summaries should include overall closures percentages. Otherwise public disclosure has not been adequately provided and the public will not be informed and the public including motorized recreationists will not be able to adequately participate and comment.

67 Issue:
The document and decision makers must prove by use of facts and data and without reasonable doubt that the claimed improvements to the natural environment are significant enough to justify the significant impact on the human environment associated with the closure of motorized routes. There must be a measurable and significant improvement. Additionally, there must be monitoring to backup the claimed improvements to the natural environment.

68 Issue:
All of the motorized routes that are important to the public cannot be identified by clubs and individuals. Everyone that visits our public lands has a special road or trail that they like to visit. Getting everyone to participate and identify all of these routes is neither practical nor reasonable. All of the existing routes exist because they are important access and recreational opportunities. Therefore, all existing routes without significant environmental considered as the preferred alternative. Additionally, all available mitigation measures must be adequately considered for those routes with environmental concerns. We strongly support mitigation before motorized closure and, in fairness to the public, encourage the agency to adopt this policy also.

69 Issue:
Due to the trend of motorized closure after motorized closure, the prevailing question is not will we lose access and recreation opportunities but rather how much will we lose in each action. Motorized recreationists are the only group to lose in every action on local, regional and national levels, yet the cumulative negative effect of this significant negative impact has never been tabulated or addressed. This obvious predisposition must be adequately addressed. The magnitude of these undisclosed cumulative negative impacts on multiple-use interest including motorized recreationists has increased to the point where the livelihood and recreation of nearly everyone has been significantly impacted yet an adequate assessment has not been conducted nor included in the decision-making. Allowing the cumulative effects of the closure trend to continue over and over without any consideration of impacts or mitigation will certainly allow the cumulative effects to eliminate any meaningful motorized recreation. The burden of establishing the cumulative negative effect of all motorized access and motorized recreational closures should not fall on motorized recreationists. Table 2 is a partial listing of projects that have had a negative impact on motorized recreationists. All of these actions and others must be included in the tabulation and evaluation of cumulative negative effects on motorized recreationists. Most of these projects have not adequately disclosed the true number of miles of roads and trails and recreational opportunities that were in use hy the public and then closed to motorized use as part of their implementation. This lack of disclosure is not acceptable and we request that the lack of disclosure be addressed by establishing the true magnitude and cumulative negative effect of all motorized access and motorized recreational closures. When tahulated, this cumulative negative effect must he considered in the evaluation and

Responses

O3-62: All alternatives designate trails for two-wheeled vehicles to provide this opportunity.

O3-63: Thank you for your comment.

O3-64: Please see responses O3-17 and O3-49.

O3-65: Thank you for your comment.

O3-66: Please see Volume III of the Draft Coeur d'Alene RMP/EIS, Maps 25-40.

O3-67: Thank you for your comment.

O3-68: Please see responses O3-17 and O3-49.

O3-69: Please see response O3-124, paragraph 2.

Comments

O3 (Cont.)

69 decision-making for this action. Additionally, adequate mitigation must now be implemented to counter the cumulative negative effects that motorized recreationists have experienced.

Issue:

70 If the loss of motorized routes cannot be mitigated within the project area, then a Motorized Access and Recreation Mitigation Bank must be established. This mitigation bank would keep an overall accounting of the miles and acres of motorized access and recreational opportunities closed and the new motorized access and recreational opportunities created to offset that loss. It would be the responsibility of a cooperative group of public land management agencies to monitor the balance sheet and work towards no net loss/closure of motorized access and motorized recreation. Similar to other mitigation banks, motorized access and routes closed to motorized use would be replaced with equivalent routes on a one to one basis. Where equivalent routes cannot be found, then mitigation would be provided at 2 to 4 times the length of the closed route. Where equivalent access and/or areas cannot be found, then mitigation would be applied at 2 to 4 times the area closed depending on the quality of the closed route or area.

Issue:

71 The cumulative negative effects of more restrictive travel plan decisions include the concentration of use on fewer miles of road and trail, such that traffic density is increased and recreation enjoyment is reduced. Travel decisions affecting public lands that restrict motorized recreation in one area may consequently increase motorized use in another where site-specific travel plans are not yet in place. Cumulatively then, this "leapfrog" effect may increase resource damage, create more law enforcement problems, generate discord between motorized and non-motorized recreationists, and make future site-specific travel planning more difficult. This cumulative negative effect must be adequately considered as part of this project.

Issue:

72 The list of projects in Table 2 demonstrates that motorized routes are all too commonly closed for exclusive non-motorized use. The proposed action continues this massive trend. The Forest Service looks out for the interests and needs of non-motorized interests and is willing to create many miles of new non-motorized trails as demonstrated by a number of projects such as the CDNST. We request the same cooperation between the Forest Service and a recreation group be extended to motorized recreationists. We request that the Forest Service provide the same attention to our needs. Now it is time for a route to be closed for exclusive use by motorcycles. We request that trails be closed for exclusive use by OHVs and that 100 miles of new motorized recreational opportunity be created as a demonstration of equal opportunity.

Issue:

73 There are very few good examples of OHV trail systems in most national forest and BLM managed lands. However, 3 OHV systems should be mentioned as good examples of the types of systems that should be developed and include Danskin Mountain in the Boise National Forest (http://www.fs.fed.us/r4/boise/conditions/Danskin_closure-map.pdf), South Fork Boise River in the Boise and Sawtooth National Forests, Winom-Frazier in the Umatilla/Whitman National Forest, Prospect in the Rogue River National Forest, and Paiute in the Fishlake National Forest and BLM lands. In order to meet the public's need for motorized recreational opportunities, every national forest and BLM district should have a number of OHV systems comparable to these examples.

O3 (Cont.)

Issue:

74 The process is predisposed because without adequately considering the needs of the public it immediately proposes to add to the vast opportunities for non-motorized recreationists that are not over-used and further impacts multiple-use visitors, who make up 97.45% of the visitors by further limiting their recreational opportunities. It has now reached the point now where multiple-use recreationists do not have an equal opportunity to enjoy our public lands. Multiple-use recreationists feel like they are being treated as second class citizens. It is bad public policy when that policy affects 97% of the public in a negative way.

Issue:

75 The prevailing trend of the past 35± years has been to convert large areas of federally managed lands in the project area and region from multiple-use lands to wilderness/non-motorized/exclusive-use lands which is direct contradiction to the number of visitors and their needs. How many "land of many uses" signs do you see anymore? The remaining multiple-use areas are the only areas where most of the public can access and experience our public lands. Therefore, the remaining multiple-use lands must remain open for multiple-use, motorized access and motorized recreation in order to adequately and reasonably meet the needs of 97.45% of the public.

Issue:

76 The greatest communal need for public lands is for multiple-use opportunities. We promote management for multiple-use because it allows everybody to enjoy the resources and it also promotes sharing and non-polarization of visitors. Other management schemes promote non-sharing and polarization of visitors. Non-sharing of multiple-use lands is not an acceptable concept. We can solve more problems by resisting non-sharing and polarization and working together.

The most equitable management of public lands is for multiple-uses. Congress has recognized this need with many laws including the Multiple Use Sustained Yield Act of 1960 (16 U.S.C. 528 et seq.) and National Forest Management Act of 1976. Multiple-Use was defined as "*The management of all the various renewable surface resources of the national forests so that they are utilized in the combination that will best meet the needs of the American people...*". Outdoor recreation is the first stated purpose of the act. Note that the pre-Columbian management scheme has not been enacted by Congress. Therefore, the Bureau of Land Management and Forest Service have a responsibility to provide recreational opportunities that meet the needs of the public just as government entities provide road, water and wastewater systems that meet the needs of the public.

Public Law 88-657 states that "*the Congress hereby finds and declares that the construction and maintenance of an adequate system of roads and trails within and near the national forests and other lands administered by the Forest Service is essential if increasing demands for timber, recreation, and other uses of such lands are to be met; that the existence of such a system would have the effect, among other things, of increasing the value of timber and other resources tributary to such roads; and that such a system is essential to enable the Secretary of Agriculture (hereinafter*

Responses

O3-70: There is no such requirement by law, regulation, or policy.

O3-71: Please see response O3-124, paragraph 2.

O3-72: Comment is directed towards USFS, not BLM.

O3-73: Thank you for your comment.

O3-74: Thank you for your comment.

O3-75: The BLM manages no wilderness in the planning area. The BLM does have the responsibility to manage wilderness study areas in accordance with BLM Handbook H-8550-1, Interim Management Policy for Lands Under Wilderness Review (IMP) until such time as Congress acts to designate them as wilderness or release them from further consideration. The basic interim management standard is termed the "non-impairment" standard and says WSAs shall be managed "in a manner so as not to impair the suitability of such areas for preservation as wilderness" (p. 2). "Management to the non-impairment standard does not mean that the lands will be managed as though they had already been designated as wilderness" (p. 5). The IMP says with regard to motor vehicle use, "Mechanical transport, including all motorized devices as well as trail and mountain bikes may only be allowed on existing ways ...(p. 16). Also, "Some lands under wilderness review may contain minor facilities that were found in the wilderness inventory process to be substantially unnoticeable. For example, these may include primitive vehicle routes ("ways") and livestock developments. There is nothing in this IMP that requires such facilities to be removed or discontinued. On the contrary, they may be used and maintained as before, as long as this does not cause new impacts that would impair the area's wilderness suitability" (p. 12). The proposed action continues to limit motorized uses to designated trails within the wilderness study areas.

O3-76: Please see responses O3-124 and O5-24.

Comments

O3 (Cont.)

called the Secretary) to provide for intensive use, protection, development, and management of these lands under principles of multiple use and sustained yield of products and services.".

The Federal Land Policy and Management Act of 1976 (FLPMA) states that "*(7) goals and objectives be established by law as guidelines for public land use planning, and that management be on the basis of multiple use and sustained yield unless otherwise specified by law;* and, *(c) In the development and revision of land use plans, the Secretary shall -- (1) use and observe the principles of multiple use and sustained yield set forth in this and other applicable law;*".

The BLM Strategic Plan FY 2000 to 2005 states that: "*To achieve this mission, the Bureau of Land Management follows these principles: Manage natural resources for multiple use and long-term value, recognizing that the mix of permitted and allowable uses will vary from area to area and over time.*"

76 Multiple-use management goals are the only goals that will "best meet the needs" of the public and provide for equal program delivery to all citizens including motorized visitors. All of visitors have a responsibility to accept and promote diversity of recreation on public lands. Diversity of recreation opportunities can only be accomplished through management for multiple-uses and reasonable coexistence among visitors. Multiple-use lands must be managed for shared-use versus segregated-use or exclusive-use.

A significant closing of roads and motorized trails in the project area is not consistent with meeting the needs of the public and the goals of Multiple-Use Management as directed under Federal Land Policy and Management Act of 1976 (FLPMA), Multiple Use Sustained Yield Act of 1960 and P.L. 88-657. Why are legally designated multiple-use lands being managed for limited-use instead of multiple-use? This is a significant issue and must be adequately addressed. The cumulative negative effects of other proposed and enacted federal land management policies have resulted in a significant reduction of multiple-use and OHV recreation opportunities. The result has been a significant conversion of multiple-use areas to exclusive non-motorized areas. We request compliance with multiple-use policies and laws and a preferred alternative that will support these policies and laws and the needs of the public

Issue:
Beginning in the early 1970's, Congress and the American people began a debate on whether or not to change national policy for vast areas of the west known as "public lands". Congress wanted to change the policy from "disposal" to "retention". This policy shift meant the Federal government would stop holding lands until they were sold (or otherwise transferred to the states), and would retain and manage the lands for the benefit of the general public.

77 Many citizens and especially those in western states were concerned. Entire communities relied upon access to resources existing on adjacent public lands. Indeed, western custom and culture grew from a tradition of open access and use of public lands. Many felt the "retention" policy would unduly influence the lives and livelihoods of citizens in the west.

In 1976, Congress struck an agreement with the western states. The basic agreement was that the western states would not oppose the retention of these lands if the Federal Government would

O3 (Cont.)

manage them under multiple use/sustained yield principles, protect valid existing rights, limit wilderness review and consider the needs and concerns of adjacent communities when formulating land use plans. Thus the FLPMA (Federal Land Policy and Management Act) was adopted.

There are 4 important elements within FLPMA:

First, and very important, was the mandate to manage lands under the principles of Multiple Use. The Section 202, subsection (c)(1), specifically requires development and revision of land use plans on the basis of "principles of multiple use and sustained yield." FLPMA section 102(a)(7) also specifically requires that goals and objectives be established by law as guidelines for public land use planning, and that management be on the basis of multiple use and sustained yield unless otherwise specified by law.

Second was the preservation of valid existing rights, including grazing rights, mining claims, oil and gas leases, water rights and rights of access granted pursuant to R.S. 2477. Therefore, the R.S. 2477 law is a very important and germane issue for this project.

77 The third element was specific instructions to the Secretary of the Interior to formulate land use plans that are consistent with State and local plans "...to the maximum extent he finds consistent with Federal law and the purposes of this Act." This element includes provisions to coordinate land use inventory, planning and management activities not only with other federal agencies, but specifically with agencies of the State and local government.

The fourth element of FLPMA consists of very specific instructions regarding Wilderness. Those instructions are contained in Section 603 of FLPMA, wherein Congress instructed the agency to inventory all of their lands, identify which were definitely not of wilderness quality, and then begin an intensive inventory and analysis to determine which of the remaining lands would be recommended for inclusion into the National, Wilderness Preservation System. Congress even set a deadline for the completion of this task. A critical part of the agreement was that FLPMA sets no mandates and no process requirements for engaging in an ongoing, never ending wilderness inventory and review. Once the "603 Process" was completed, the agency would be finished with wilderness inventory and review. Congress and the American People would then decide which lands to include in the National Wilderness Preservation System.

We simply ask that all of the instructions and requirements of the law as agreed to under the Federal Land Policy and Management Act be honored and applied to this project.

Issue:
Any language in existing management plans for multiple-use areas that does not support multiple-use is inconsistent with directives from Congress, the needs of the public and should be struck. Any
78 proposed language for the management plans for multiple-use areas that does not fully support multiple-use is inconsistent with directives from Congress, the needs of the public and should be dropped.

Issue:

Responses

O3-77: Compliance with applicable laws (which most definitely includes the FLPMA) is a cornerstone of the planning criteria for this RMP planning effort as published in the Federal Register Notice of Intent. See Chapter 1, Section 1.5.

Also refer to response O4-1.

O3-78: Please see response O3-3.

Comments

O3 (Cont.)

Under the Organic Act of 1897, 16 U.S.C. § 475, ("Organic Act"), National forests were expressly reserved for two purposes: to maintain favorable conditions for water flows and to ensure a continuous supply of timher. With passage of the Multiple Use and Sustained Yield Act, 16 U.S.C. § 528 et. seq. ("MUSYA"), Congress allowed the Forest Service to manage "renewable surface resources of the national forest for multiple use and sustained yield of the several products and services obtained therefrom." However, while the "multiple use" mandate of MUSYA broadened the purposes for which National forests may he managed, the Act did not further reserve National forests for multiple use purposes. See United States v. New Mexico, 438 U.S. §§ 696, 706-18 (1978). MUSYA defines "sustained yield of the several products and services" as "the achievement and maintenance in perpetuity of a high-level annual or regular periodic output of various renewable resources of the national forests without impairment of the productivity of the land." 16 U.S.C. § 531(h). Nowhere does MUSYA mention ecological sustainability or authorize it as a dominant use.

Although the National Forest Management Act ("NFMA") does not define sustained yield or sustainahility, NFMA requires forest planning to be consistent with the MUSYA. 16 U.S.C. §§ 1602,1604. Like the MUSYA, NFMA requires the Forest Service to consider environmental and ecological factors in land use planning. However, also, like MUSYA, NFMA does not elevate ecological factors above any other multiple-use nor does it require that National forest land use plans be contingent only upon ecological sustainability considerations. The proposed alternative effectively elevates "ecological sustainability" above all other uses is based upon several faulty assumptions.

79

First, the proposed alternative wrongly assumes that the "sustained yield" mandates of MUSYA and NFMA require "sustainability." Thus, the proposed alternative expands the concept of sustained yield significantly heyond what is allowed by the MUSYA and NFMA. As stated above, "sustained yield" under the MUSYA simply means the maintenance of a regular output of several renewable resources.

Second, the proposed alternative wrongly assumes that all sustainability must be predicated upon ecological sustainability. The proposed alternative assumes that sustainability (or sustained yield) of any sort cannot be achieved without first achieving ecological sustainability. However, this assumption is false. While biological diversity undisputably affects certain legitimate uses of National forests, it is not essential to multiple use and sustained yield, as defined by the MUSYA. For example, timber harvest and water flows can be managed on a sustainable yield basis (as required by statute) with little species diversity. On the other hand, some uses, such as recreation, may require a high degree of species diversity (fishing, research, wildlife watching), while recreational uses of the forest require little or no species diversity (rock climbing, skiing). Still others, such as mining, require no species diversity whatsoever. Certainly, ecological sustainability and species diversity are important considerations in forest land use planning, and are often essential to maintaining certain legitimate uses on a sustained basis. However, the assertion that species diversity is absolutely necessary to maintain the sustained yield of multiple goods and services is unsupportable, and cannot justify elevating the primary focus of land use planning to species diversity. In sum, the proposed alternative should report and reflect the true nature and role of ecology in multiple use and sustained yield management not elevate it over the Congressional mandates.

O3 (Cont.)

Third, the proposed alternative wrongly assume that ecological sustainability as the primary focus of forest planning best meets the needs of the American people. The MUSYA defines "multiple use" as the management of various renewable resources in a combination which best meets the needs of the American people. 16 U.S.C. § 531(a). Elevation of biological diversity and ecological sustainability to the chief planning factor assumes a priori that such values, in all cases, best meet the needs of the American people; this presumption is in error and must be established on a case by case basis.

Fourth, in addition to not following the mandates of the Organic Act, MUSYA, and NFMA, the document states that the enactment of various other laws, including the National Environmental Policy Act ("NEPA"), the Endangered Species Act ("ESA"), the Clean Air Act ("CAA") and the Clean Water Act ("CWA") "reinforce ecological sustainability as the first priority of National Forest system management." Id. Again, this is incorrect; none of these statutes in any way change the mandates for the management of National forests. See e.g. Platte River Whooping Crane Trust v.
79 Federal Energy Regulatory Commission, 962 F.2d 27, 34 9D.C. Cir. 1992) (holding that the ESA does not mandate that federal agencies violate their statutory authority in protecting listed species). For example, the document cites a policy statement set forth in the preamble to NEPA as a mandate to manage for ecological sustainability. However, as the courts have made clear, the NEPA is a procedural act only, designed to promote consideration of enviroumental impacts in federal decision-making, and cannot mandate any substantive result. See Robertson v. Methow Valley Citizens Council, 490 U.S. 332, 350 (1989).

In summary, the proposed alternative is built upon a tenuous foundation which assumes that: (1) various statutes require that ecological sustainability be the dominant consideration for all management of National forests; (2) sustained yield of various goods and services derived from the forests cannot be achieved without first achieving ecological sustainability; and (3) that ecological sustainability in all cases is the highest and best use of the forests for the American people. To be supportable, these assumptions would require significant legal, scientific, and economic data. As it is, such data has no been provided and these assumptions are false, therefore, the proposed alternative is flawed and should not be adopted.

Issue:

In order to achieve ecological sustainability as the proposed alternative defines it, the ecological condition of the project area must be within the range of those found prior to European Settlement.

1. This standard is illegal and inappropriate under applicable law. First, legitimate multiple use activities such as timber harvest and mining rarely occurred on a large scale prior to European settlement. Thus, to achieve ecological sustainability, such activities must be excluded. This is a violation of the Organic Act, MUSYA, and NFMA.
2. Second, no statutory authority exists which mandates that ecological conditions of any kind
80 must reflect pre-European settlement conditions.
3. Third, the assumption that ecological conditions prior to European settlement are better than conditions at any time since then is a purely subjective value judgment, and is not appropriate to consider during the planning process.
4. Finally, the scientific evidence which suggests what ecological conditions were like prior to European settlement is highly speculative. Basing all planning and management around a range of variability which can never be definitively determined is illusory, arbitrary and capricious and violates the Organic Act, MUSYA, and NFMA.

Responses

O3-79: Comment pertains to national forests, not BLM land.

O3-80: None of the alternatives defines ecological sustainability in this way. Comment must be in reference to a different document.

Comments

O3 (Cont.)

Issue:
Identification of "high social, cultural, or economic value" and "desired" levels are subjective and requires an assessment and balancing of public values. For example, a particular species may have a high social value to a particular segment of the population, but a low social value to another. Similarly, a species may have significant economic value for a particular use (trees cut for timber), but have high social value in the context of an entirely different use (trees observed by hikers). Furthermore, these conflicting values may require entirely different "desired" levels. Despite these extremely complex and subjective determinations, the proposed alternative provide virtually no explanation or guidance regarding how these levels and values were established. This extreme discretion is not allowed by the Organic Act, MUSYA, and NFMA, which require that forests be managed for a variety of uses.

81

Issue:
Under applicable law, economic and social considerations are just as important ecological analyses and should be given equal consideration. This is especially true for the social and economic concerns at the state and local level. Consider the following:

1. The Organic Act has long been interpreted as requiring that National forest lands be managed to promote the local economic and social stability of the dependant communities. The first Chief of the Forest Service, Gifford Pinchot wrote: "*In the management of each reserve, local questions will be decided upan lacal grounds . . . . sudden changes in industrial conditians will be avoided by gradual adjustment after due notice . . . .* " Forest Service, United States Department of Agriculture, The Use Book (1906 ed.) at 17. The first congressional concerns for the stability of communities dependent on the resources of the National forests arose during debates surrounding passage of the Organic Act. The National Academy of Sciences had criticized past land management practices that allowed companies and individuals to cut excessive quantities of timber without monetary charge. Nevertheless, the debates surrounding the Organic Act centered on protecting the forests from fire and insect damage, ensuring that the forests serve to conserve water resources for the arid West, and managing the forests for economic purposes. S. Rept. No. 105, 10, 19. In fact, after describing the depredations of fire, livestock, and illegal timber cutting, one Senate report concluded: *A study of the forest reserves in relation to the general development af the welfare of the country, shows that the segregations of these great badies of reserved lands cannat be withdrawn fram all occupatian and use and that they must be made to perform their part for the economy of the natian. Accarding ta a strict interpretation of the rulings of the Department of the Interiar, na ane has the right to enter a forest reserve, to cut a single tree fram its farests, ar ta examine it rocks in search of valuable minerals. Forty millian acres of land are then thearetically shut aut from all human occupation or enjayment. Such a conditian of things should not continue, for unless the reserved lands af the public domain are made to contribute to the welfare and prasperity of the country, they shauld be thrown apen ta settlement and the whole system af reserved forests be abandoned.* S. Rep. No. 105, 22.
2. The notion of community stability grew out of Congress' concern for the impacts on local communities. During the passage of the Organic Act, Congressman Safroth echoed this concern: *The farestry question is not a matter of great concern from a national stand paint,*

82

O3 (Cont.)

because the purposes for which these reservatians are set aside are merely lacal. It is a matter af interest to peaple in the West only as ta whether these reservatians are praperly established. It is an account of the waters which are ta irrigate our agricultural lands that we are interested in forest reservatians. . . . . The timber reserves af that regian can never be a subject of natianal concern althaugh they may be af great interest ta the people of that particular locality -- the people af Calarada, Utah and other Western communities. 30 Cong. Rec. 984 (1897).

3. Congress has never changed its concern for local communities. Eleven years following the passage of the Organic Act, Congress passed the Twenty-Five Percent Fund Act, under which 25 percent of the revenues from the national forests are returned to the states. 16 U.S.C. § 500. In 1913, Congress directed that another 10 percent of the National forest revenues be spent on road construction and local road maintenance. 16 U.S.C. § 501. In 1976, Congress amended the Twenty-Five Percent Fund Act to provide that the disbursement to state and local governments would be calculated from gross revenues, rather than stumpage prices. 16 U.S.C. § 500, National Forest Management Act of 1976, Report of Senate Committee of Agriculture and Forestry, S. Rep. 94-893 (May 1976) 1, 22-3.
4. These examples clearly illustrate that Congress intends National forests to be a driving force in promoting and sustaining state and local communities and governments, both economically and socially. The multiple use and sustained yield of several goods and services mandate of MUSYA and NFMA reinforce this concept. Accordingly, the proposed alternative should give more weight to these concerns. Economic and social impact analysis should be mandatory at all levels of forest planning and management.

82

Issue:
With regard to wilderness areas, roadless areas, national recreation areas, natural landmarks and monuments, and wild, scenic, and recreational rivers, the Bureau of Land Management and Forest Service are only authorized to delineate such areas and report such findings to Congress. Unless and until Congress actually designates such areas under applicable law, such delineations should have no effect on the multiple use and sustained yield mandates for management of public lands.

With regard to research and natural areas and scenic by-ways, the BLM and FS can designate such areas; however such designation should have no effect on the multiple use and sustained yield mandates for management of those public lands. Finally, with regard to critical waterways, geological areas, unroaded areas, botanical areas, and national scenic areas, the BLM and FS have no statutory authority to designate and manage such areas. Any such designations can by law have no effect on the multiple use and sustained yield mandates for management of national forests. Accordingly, these "special designations" should he deleted from the proposed alternative.

83

Issue:
Note that the Final Roadless Rule puhlished on January 5, 2001 (http://roadless.fs.fed.us/documents/rule/roadless_fedreg_rule.pdf) included the following directive "The proposed rule did not close any roads or off-highway vehicle (OHV) trails". The agency must honor this commitment. The Roadless Rule is all ahout preventing new roads from heing constructed; it is not about banning motorized use of existing motorized roads and trails. United Four Wheel Drive Associations reached a settlement agreement with the Federal Government

84

Responses

O3-81: Such values were determined through public input and as a result of socioeconomic studies prepared by BLM and other sources. The Organic Act, MUSYA, and NFMA pertain to national forests and the forest service, not BLM-administered public lands or BLM.

O3-82: Assuming that the commenter is referring to the National Forest Organic Act of 1897, this comment then refers to management of national forests, not BLM lands.

O3-83: Please refer to the Special Designations section in Chapter 2. Also refer to responses P1-1, paragraph 2 and O5-13.

O3-84: This roadless rule applies to national forests, not BLM lands.

Comments

O3 (Cont.)

84 prohibiting the US Forest Service from categorically closing roads or using the term "unroaded" in establishing roadless areas for Wilderness designation. Under the terms of the settlement agreement the Forest Service is banned from using the Road Moratorium to close a single mile of road". Unite obtained evidence that many, if not all, of the national forests were using the Temporary Road Moratorium to create de facto wilderness areas as part of forest planning. Carla Boucher of United predicted in early 1998 that this was the plan of the Forest Service all along. "This agreement prevents the creation of de facto wilderness, protecting nearly 347,000 miles of access for motorize recreationists", remarked Boucher. Additionally, the ruling in the State of Wyoming v. USDA by U.S. District Court Judge Clarence Brimmer blocked implementation of the Roadless Area Conservation Rule. This project must include proper interpretation of the Roadless Rule and the roadless rule should not be used to close existing motorized routes in roadless areas.

Issue:

85 A November 2003 national voter survey by Moore Information (http://www.cdfe.org/poll.htm) reveals that most Americans agree that the scores of environmental groups in Montana and throughout the nation have lost their focus. Specifically, 61% of voters nationwide agree with the statement; "While protecting the environment is important, environmental groups usually push for solutions which are too extreme for me." Just 33% disagree with this, and 6% have no opinion. In the Mountain/Plains region that includes Montana the divergence is even more severe. A full 71% of respondents agree with the previous statement, and only 25% disagree. Additionally a poll by Market Research Insight (MRI) in December 2003 found that 27% of the public supported environmental groups and 53% opposed their actions.

In order to be true and responsive to the public, decisions should not be based on pressure from environmental groups and their litigation. Public opinion supports this position.

Issue:

86 Environmental groups with substantial funding and paid staff are likely to provide substantial input to the process and to challenge the process through appeals and legal actions. The magnitude of funding and the influence available to these has been documented by the Independent Record in a series of articles found at: http://www.helenair.com/articles/2002/03/11/stories/headline/1a2.txt , http://www.helenair.com/articles/2002/03/10/stories/headline/7a1.txt , and http://www.helenair.com/articles/2002/03/10/stories/headline/1a1.txt and the Sacramento Bee at http://www.sacbee.com/static/archive/news/projects/environment/index02.html , at Activist Cash http://www.activistcash.com/index.cfm and at Green-Watch http://capresearch.brinkster.net/search/search.asp .

O3 (Cont.)

The greening of the environmental movement

1999 figures, in millions of dollars, for 20 environmental groups with largest contributions

	Group	Public contributions	Total revenue*	Spending	Top executive salary
1	The Nature Conservancy	$403.4	$704.0	$359.4	$210,151
2	Trust for Public Land	$94.9	$105.7	$51.4	$157,868
3	Conservation International	$76.7	$83.5	$26.2	$203,049
4	World Wildlife Fund	$68.4	$111.3	$89.7	$241,638
5	Ducks Unlimited	$63.4	$108.6	$109.1	$346,882
6	Natural Resources Defense Council	$32.6	$36.1	$30.6	$238,964
7	Conservation Fund	$32.5	$41.9	$27.7	$211,048
8	National Wildlife Federation	$31.2	$88.1	85.9	$247,081
9	National Audubon Society	$30.7	$64.7	$53.6	$239,670
10	Environmental Defense	$28.4	$32.0	$26.3	$262,798
11	Sierra Club	$19.1	$56.5	$54.3	$199,577
12	Rocky Mountain Elk Foundation	$17.5	$36.3	$34.9	$186,369
13	The Wilderness Society	$17.4	$18.8	$14.3	$204,591
14	Sierra Club Foundation**	$16.4	$17.8	$12.8	$100,000
15	National Parks Conservation Association	$14.6	$18.3	$16.6	$172,879
16	Earthjustice Legal Defense Fund	$12.2	$16.1	$13.3	$157,583
17	Defenders of Wildife	$10.3	$14.9	$13.3	$201,337
18	Greenpeace Inc.	$9.9	$14.0	$11.1	$54,033
19	Save The Redwoods League	$9.8	$11.4	$8.9	$165,110
20	Center for Marine Conservation	$8.6	$9.9	$8.7	$135,806

*Includes public contributions and government grants, etc. **The Sierra Club Foundation is the tax-deductible fund-raising arm of the Sierra Club.

Source: Bee research

Sacramento Bee/Scott Flodin

86 This influence on the agency's decisions must be balanced by the needs and opinions of the public for multiple-use opportunities. Investigation of this balance will determine that the groups listed above are out of line with the majority of the public's needs and interests.

Issue:

87 A major loophole in the NEPA compliance arena exists. NEPA compliance is not being applied to the actions of foundations that contribute heavily to environmental groups and the actions (campaigns) that those well-funded environmental groups use that funding on. Actions follow funding whether it is for a new highway or an environmental crusade. Certainly these actions such as the environmental crusade against snowmobile use in Yellowstone National Park have affected the quality of the human environment including motorized recreation and interstate commerce opportunities. NEPA was intended to protect the quality of the human environment. Significant funding whether it is used to build highways or finance the campaigns of environmental groups is the source of all actions. NEPA should be applied to the large grant activities (actions) of Foundations and the high dollar action campaigns of environmental groups just as it is for new highway projects.

Issue:

88 Agency decision-making is being driven by accepting actions that will not be challenged in court versus decisions that are in the best interests of the public or that would meet the public's needs. For example, the January 21, 2004 Missoulian newspaper quoted Lolo Forest Supervisor Debbie Austin "Then, too, it's probably not worth taxpayer dollars to propose a big-acreage, big-ticket salvage sale that's likely to be challenged in court, she said." The ethics of making decisions that are in the best interest of the public and that meet the needs of the public must be restored regardless of the dollar cost. Failure to base our government on these principles will be devastating in the end and we must restore decision-making based on these principles.

Responses

O3-85: Planning issues and, therefore, the alternatives, were developed as a result of input from any member of the public who wished to comment. The number one planning issue is in relation to motorized recreational access, indicating a high level of input from members of the public who care about such use of CDAFO lands.

O3-86: Please see response O3-85.

O3-87: Funding was not a major consideration in developing alternatives. It was only consider when analyzing the practicality and reasonableness of the alternatives. It had no influence on development of the travel management alternatives.

O3-88: The alternatives are designed to address the issues BLM identified from public input during scoping. However, the RMP and the planning process must also comply with federal laws and regulation, which often limit the decision space.

Comments

O3 (Cont.)

Issue:

89 Why are the extreme motorized closure alternatives presented and a middle of the road alternative based on existing routes plus new motorized routes needed to meet the public's need not presented? We are concerned that this demonstrates a significant predisposition in the current process.

Issue:

90 One of the basic requirements of NEPA is to "achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities" (Public Law 91-190, Title I, Section 101 (b) (5)). The wording of NEPA was carefully chosen and was intended to produce a balance between the natural and human environment. Practice and interpretation since the law has strayed far from that intent.

Issue:

91 Over the past 35 years (and it is accelerating in recent years) the overarching public land management trend has been to close access to and use of public lands. This trend of closure upon closure has become epidemic and is out of control as demonstrated by popular public opinion. A sampling of different users and perspectives is provided below to demonstrate this trend and the cumulative negative impacts that it has produced.

http://www.billingsgazette.com/index.php?display=rednews/2004/04/25/build/local/32-land-use-protest.inc
http://www.mtstandard.com/articles/2004/05/14/newsspecialreports/hjfjfiejgcffhb.txt
http://www.billingsgazette.com/index.php?id=1&display=rednews/2003/11/11/build/wyoming/30-blm.inc
http://www.dailyinterlake.com/NewsEngine/SelectStory.tpl?command=search&db=news.db&eqskudata=57-816431-10&search-var=multiple
http://www.dailyinterlake.com/NewsEngine/SelectStory.tpl?command=search&db=news.db&eqskudata=9-816800-3&search-var=multiple
http://espn.go.com/outdoors/hunting/news/2001/1106/1274551.html
http://www.aapg.org/explorer/2003/05may/slc_publandside.cfm
http://www.nanpa.org/docs/PublicLandsAccess.pdf
http://www.washington-state-rockhounding.info/Trespass-index.htm
http://www.sdorc.org/news/tortoise_lawsuit.html
http://www.amfed.org/sfms/public-lands-access.html
http://www.gamineral.org/land-access.html
http://www.paragonpowerhouse.org/bush_promises_collaboration_on_p.htm
http://www.delalbright.com/landuse.htm
http://www.off-road.com/orcland.html
http://www.hcn.org/servlets/hcn.Article?article_id=5735
http://www.sportsmenslink.org/articles/FinalWhitePage-Total.pdf
http://www.4x4wire.com/access/news/united/dea_2002.htm
http://responsiblerecreation.policy.net/newsroom/
http://www.helenair.com/articles/2003/06/01/opinions/a04060103_02.txt
http://www.maccusa.com/
http://www.sportsmenslink.org/programs/hunter/Issues.html
http://www.ssfta.com/land/land.htm

Many additional articles can be found by searching the web for keywords "public lands access". By far the loss of access and the trend of motorized closures upon motorized closure on public lands are the most common themes. From the public's perspective the #1 problem is access to adequate multiple-use access and recreational opportunities and the fact that these opportunities are being eliminated at a record pace by federal land use agencies. It is time to recognize that the trend of closure of public land to the public is inequitable. It is also time to undertake adequate correction to reverse the cumulative negative impact of 35 years of closure upon closure. It is also time to implement adequate mitigation to compensate for the cumulative negative impacts caused by the trend of inequitable closures that are now significant.

Issue:

O3 (Cont.)

92 The overarching trend of the last 35 years has been to remove people from the land. This trend has occurred as a result of many different factors including creation of national parks and monuments; creation of wilderness, non-motorized, and roadless areas; policies of the Forest Service and Bureau of Land Management; influx of dollars for conservation easements and land trusts; decline of farming and ranching; and decline of mining and timber harvests. People still have the same need and desire to work and recreate on the land but they no longer have the same opportunity. The cumulative negative effect of the different trends that have removed people from the land is so significant now that any additional impacts must be avoided. Additionally, because the cumulative negative effect is so significant, adequate mitigation measures must be included as part of all future actions.

Issue:

93 Evaluations and decisions have been limited to natural resource management issues. Issues associated with motorized access and motorized recreation must be adequately addressed during the evaluation and decision-making including social, economic, and environmental justice issues. We are concerned that issues cannot be restricted to just those associated with natural resources. Access and recreation on public lands are essential needs of the public in Montana and we respectfully request that issues associated with the human environment be adequately addressed.

Issue:

94 Montana ranks very low for social conditions (44th state per Fordham Institute for Innovation in Social Policy,) and social issues are relevant to this action. Motorized recreation is a healthy social activity. These types of issues are associated with motorized access and recreation in the project area and these issues must be adequately addressed. Social issues must be adequately evaluated per the SOCIAL IMPACT ANALYSIS (SIA): PRINCIPLES AND PROCEDURES TRAINING COURSE (1900-03) (http://www.fs.fed.us/emc/nepa/includes/sia.html) and Environmental Justice issues per Departmental Regulation 5600-2. The evaluation and resulting decision must adequately consider and address all of the social and economic impacts associated with the significant motorized access and motorized recreational closures.

Issue:

95 Dr. Martin E.P. Seligman has identified that learned helplessness or *the belief that your actions will be futile* is an epidemic affecting the nation (page 70, ISBN 0-671-01911-2). The evaluation of social issues must also include an evaluation of conditions contributing to learned helplessness including the lack of recognition and attention to the needs of motorized recreationists and the significant social problems that result from these conditions.

Issue:

96 Over the past 35 years (and it is accelerating in recent years), motorized recreationists have had to bear a disproportionate share of the negative consequences on the human environment resulting from the significant closure of motorized access and motorized recreational opportunities by federal land management actions and policies. We continue to ask for a reasonable explanation of "Why are we the only ones to lose in every action?" And yet the trend of motorized closures continues at an ever increasing pace.

Responses

O3-89: Please see response O3-124.

O3-90: Thank you for your comment.

O3-91: Thank you for your comment.

O3-92: Please see response O3-3.

O3-93: Please see Sections 2-130 through 2-134, and Section 4.5 of the DRMP/EIS. Also see response O3-85.

O3-94: Section 4.5 discusses planning area and regional impacts to socioeconomics and environmental justice.

O3-95: The social setting of the planning area was considered in identification of planning issues and in development and analysis of alternatives.

O3-96: The BLM Land Use Planning Handbook (H-1601-1) (BLM 2005) states "Environmental Justice involves the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means that no group of people, including racial, ethnic, or socio-economic group should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of Federal, state, local, and Tribal programs and policies." BLM's effects analysis (Section 4.5) found that no such group of people would bear a disproportionate share of the negative environmental consequences resulting from the alternatives for this plan.

Comments

O3 (Cont.)

We believe that federal environmental justice compliance requirements as initiated by Executive Order 12898 should be applied immediately to correct the disproportionately significant and adverse impacts that motorized recreationists have been subjected to. In order to accomplish this we request that this proposed action comply with U.S. Forest Service Departmental Regulation 5600-2 (http://www.usda.gov/da/5600-2.pdf) including the DEFINITION of environmental justice provided therein:

> *ENVIRONMENTAL JUSTICE means that, to the greatest extent practicable and permitted by law, all populations are provided the opportunity to comment before decisions are rendered on, are allowed to share in the benefits of, are not excluded from, and are not affected in a disproportionately high and adverse manner by, government programs and activities affecting human health or the environment.*

While some of the guidance published on environmental justice refers to specific minority and low-income populations, the intent of the guidance must be taken in a broader sense as recommended by the EPA in order to avoid discrimination or unfair treatment of any significantly impacted sector of the public:

96 In order to correct the disproportionately significant and adverse impacts that motorized recreationists have been subjected to we request that the proposed action comply with EPA's Office of Environmental Justice (http://www.epa.gov/compliance/resources/policies/ej/ej_guidance_nepa_epa0498.pdf) including:

> *The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means that no group of people, including racial, ethnic, or socioeconomic group should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies.*
>
> *The goal of this "fair treatment" is not to shift risks among populations, but to identify potential disproportionately high and adverse effects and identify alternatives that may mitigate these impacts.*

Unfortunately, the treatment of motorized recreationists does not meet the definition of fair treatment and environmental justice requirements must be complied with in order to correct the situation.

We request that the proposed action comply with the Council on Environmental Quality (http://ceq.eh.doe.gov/nepa/regs/ej/justice.pdf) recommendations in order to correct the disproportionately significant and adverse impacts that motorized recreationists have been subjected to including:

O3 (Cont.)

> *Thus, agencies have developed and should periodically revise their strategies praviding guidance cancerning the types of programs, policies, and activities that may, or historicolly have, raised environmental justice cancerns at the particular agency.*
>
> *The Executive Order requires agencies to work to ensure effective public participatian and access to informatian.*

The cumulative negative impact of all closures on motorized recreationists are significant and warrants a revised strategy to deal with the issues surrounding this condition.

> *Agencies should recognize the interrelated cultural, social, accupational, historical, or econamic factors that may amplify the natural and physical enviranmental effects of the praposed agency action. These factors shauld include the physical sensitivity of the community or population to particular impacts; the effect af any disruptian on the community structure associated with the proposed action; and the noture and degree of impact on the physical and social structure of the community.*

To date, all of these factors have not been adequately examined with respect to motorized recreationists and the trend of excessive motorized access and recreational closures.

96 > *Agencies should encourage the members of the communities that may suffer a disproportionately high and adverse human health or environmental effect from a praposed agency actian to help develop and comment on possible alternatives to the proposed agency action as early as possible in the process.*

Motorized recreationists have not had the opportunity to develop mitigation plans required to address the significant impact resulting from cumulative effect all closures.

> *When the agency has identified a disproportionately high and adverse human health or environmental effect on law-income populations, minority populations, or Indian tribes from either the proposed action or alternatives, the distribution as well as the magnitude af the dispropartionate impacts in these communities should be a factor in determining the environmentally preferable alternative.*

We maintain that the intent of identifying low-income populations, minority populations, or Indian tribes is simply to portray examples of affected groups. The EPA guidance included above supports this conelusion. To date, the disproportionate impact on motorized recreationists has not been a factor when determining the preferred alternative and it should be, in fact, just the opposite is occurring (our needs are being ignored).

> *Mitigation measures include steps to avoid, mitigate, minimize, rectify, reduce, or eliminate the impact associated with a proposed agency action. Throughout the process of public participation, agencies should elicit the views of the affected populations on measures to mitigate a disproportionately high and adverse human health or environmental effect……*

Responses

Comments

O3 (Cont.)

Motorized recreationists have been affected in *a disproportionately high and adverse manner* by the significant impact that has occurred from all cumulative closures of motorized access and motorized recreational closures including actions by the Forest Service and Bureau of Land Management associated with travel planning, forest planning, watershed planning, water quality districts, wilderness study areas, research areas, timber sales, and creation of monuments, non-motorized and wildlife management areas. We are also concerned that this has occurred on lands intended by congress to be managed for multiple-uses. Multiple-uses include motorized access and motorized recreation.

The efforts to involve motorized recreationists in the process using unique methods as required by the environmental justice regulations have not happened. The process must allow for and accommodate that needs of citizens who, for the most part, act and live independently and are not organized to the level of environmental organizations. Thomas Mendyke, Outdoor Editor for the Independent Record made the following statement in his article on November 20, 2003 *Outdoor enthusiasts frequently find themselves at odds with big money interests. Generally speaking, people who pursue outdoor interests tend to be an independent lot. Sporting groups usually are poorly funded, loosely organized and ill-prepared to match the financial and legal power their adversaries often possess.*

96

The process should not allow well-organized and funded groups to take opportunities away from less-organized and funded individuals. This certainly is an environmental injustice. Moreover, the development of measures as required by environmental justice regulations to mitigate the *disproportionately high and adverse* impacts that have affected motorized recreationists has not happened.

We request a corrective action and over-arching mitigation plan that will undo the significant impact that all cumulative motorized access and motorized recreational closures has had on motorized recreationists over the past 35 years. We also request a monitoring program be provided by an unbiased third-party to assure that this correction occurs within our lifetime.

Issue:

A recent study by David Sunding, an associate professor of natural resource economics, David Zilberman, a UC Berkeley professor of agriculture and resource economics, and graduate student Aaron Swoboda to the California Resource Management Institute found that the economic impacts from designation and preservation of special plant and animal habitat areas continue to cost society hundreds of millions of dollars because of delays, court fees and opportunities forgone. Sunding's report, released Feb. 20, found that agencies had underestimated the actual economic and social impact by seven to 14 times.

97

Certainly, natural resource decisions cannot and should not be made entirely on economic impacts. However, NEPA requires that both economic and environmental facts should be considered in the final land management decisions. The U.C. Berkeley study displays the fact that the full economic and social facts and impacts are not being adequately considered by the federal land management agencies. We request adequate evaluation of the economic and social impacts of this proposed action be considered in the analysis and decision-making. Additionally, we request that the cumulative negative impact resulting from inadequate evaluation of economic and social impacts in

O3 (Cont.)

past actions are considered in the analysis and decision-making and that an adequate mitigation plan be included as part of this action to compensate for past cumulative negative impacts.

97

Issue:

The positive economic impact on the economy of the area must be adequately considered in the decision-making. Arizona State Parks has prepared a good example of an economic analysis of OHV recreation for Coconino County, AZ (http://www.gf.state.az.us/pdfs/w_c/OHV%20Report.pdf). The economic impacts of OHV recreation in one county are significant with $258.3 million statewide impact and a $215.3 million impact locally that supports 2,580 jobs. Off-highway vehicle recreation activity is an immensely powerful part of the Arizona collective economic fabric, generating nearly $3 billion in retail sales during 2002 (http://www.gf.state.az.us/pdfs/w_c/OHV%20Report.pdf).This evaluation should be used as guideline to evaluate the existing and potential positive economic impacts associated with OHV recreation in the project area. Additionally, the study does a good job assessing the activities and reasons that recreationists enjoy using off-highway vehicles. Another study conducted by __ found that the total estimated itemized expenditures by households participating in OHV Recreation in Colorado in 2000 was $519,333,239.

Additional information on the importance of OHV recreation to the economy of the project area can be found at:

98

1. Gilmore Research Group, 1989, Washington DNR, Assessment of ORV impact and use in Roslyn-Cle Elum, WA.
2. Haas, Glenn et al, 1989, Colorado Sate University, Estimated CO recreational use and expenditures for OHV in FY 1988.
3. Tyler & Associates, 1990, CA DOT, A study of fuel tax attributable to OHV and Street Licensed vehicles used for recreation off-highway.
4. CA OHMVR Division , 1994, CA Department of Parks and Recreation, A 26 page study of the $3 Billion economic impact of OHV use in CA.
5. Oak Ridge National Laboratory, 1994, Federal Highway Administration, Report ORNL/TM-1999/100, Federal Highway Administration, An 80 page summary of the fuel used for OHV recreation, http://www-cta.ornl.gov/publications/offroad.pdf .
6. CA OHMVR Division, 1991, CA Department of Parks and Recreation, A 119 page summary of the status of OHV recreation in CA.
7. Schuett, Michael , 1998, West Virginia University, 14 page report on OHV user values and demographics.
8. Motorcycle Industry Council (MIC), 1998, 20 page statistical report of motorcycle population, sales and usage.
9. Generoux, John & Michele, 1993, Minnesota DNR, 33-page report on feasibility of Iron Range OHV Rec'n Area.
10. Hazen and Sawyer, 2001; Colorado Off-Highway Vehicle CO, 144-page analysis of economic impact of OHV recreation in Colorado which is estimated at $230 million, (http://cohvco.org/economics/main.html).
11. Tennessee OHV Economic Impact, A $3.4 Billion Industry, http://www.state.tn.us/environment/ohv/ohvimpacts.pdf, http://www.state.tn.us/environment/ohv/econimpact.pdf .

Responses

O3-97: A socioeconomic report has been prepared for this project, and is available for public review at http://www.blm.gov/rmp/id/cda/. BLM relied heavily on this report when describing the affected environment and during analysis of the environmental consequences of the alternatives.

O3-98: Section 4.5.1 describes the impacts of the travel management alternatives on socioeconomics. Also see response above O3-97.

Comments

O3 (Cont.)

12. March 2003 Presentation at the National OHV Managers Meeting in Charlotte, North Carolina, http://www.etra.net/Newsletters/2003/July2003.htm.
13. Nelson, C.M., Lynch, J.A., & Stynes, D.J. 2000. Michigan Licensed Off-Road Vehicle Use and Users, 1998-99. East Lansing, MI: Department of Park, Recreation and Tourism Resources, Michigan State University, http://www.prr.msu.edu/miteim/orvspend.pdf .
14. Jonathan Silberman, PhD. The Economic Importance Of Off-Highway Vehicle Recreation, Economic data on off-highway vehicle recreation for the State of Arizona and for each Arizona County Study, Prepared by School of Management, http://www.gf.state.az.us/pdfs/w_c/OHV%20Report.pdf
15. Hazen, S. (2001). Economic Contribution of Off-Highway Vehicle Use in Colorado, Colorado Off-Highway Coalition.

98

A common theme with the public and local and state governments has been the need for more economic development in the area and they are searching for ways to expand and enhance the local economy. OHV recreation is a significant part of the existing economy. Any reduction in OHV recreational opportunities will hurt the local economy. Additionally, the enhancement of OHV recreational opportunities in the project area will provide a badly needed enhancement of the overall local economy as well.

Issue:
There has never been an accounting of the cumulative negative impact of all motorized closures that have occurred over the past 35 years. Actions that have contributed to the significance of the cumulative negative impact on motorized recreation include millions of acres and thousands of miles of roads and trails associated with Endangered Species Act; Continental Divide National Scenic Trail; forest fires; timber harvests, forest plans; view shed plans; resource plans; watershed plans; roadless plan; creation of wildlife management areas, monuments, non-motorized areas, wilderness areas, and wilderness study areas; area closures, and last but certainly not least, travel plans. This cumulative negative impact has not been quantified and it is significant.

99

In order to evaluate this cumulative negative effect, an accounting of all motorized closures must be done at 5-year increments going back to the creation of the wilderness act. This accounting needs to be done on a local forest or district level in addition to statewide and regional levels. For example, loss of motorized access and motorized recreational opportunities since 1986 in our immediate area (Helena National Forest) include: 18 separate closures in the Big Belts with the loss of 42.15 miles; 130 miles in other areas; closure of 191,000 acres and 75 miles in the Elkhorn Mountains; and closure of 625,447 acres in the remainder of the forest. Both adjoining public lands and public lands further away have experienced similar trends. Therefore, the cumulative negative impact of all motorized access and recreational closures is significant. Simply, there are very few places left where motorized recreationists can recreate and yet the trend continues. This stealthy attack on motorized recreational opportunities must be acknowledged. Please quantify and consider these cumulative negative impacts and develop a preferred alternative that will mitigate the significant impact on motorized recreationists that has occurred.

Issue:
100 We are concerned that the lack of accounting for the cumulative negative impact of all forms of motorized closures over the past 35 years is an undisclosed strategy to squeeze motorized

O3 (Cont.)

100 recreationists into the smallest possible area. Once this is accomplished, then the agencies will take the position that the impacts on that small area left for use is significant and everything will be completely shut down. All of the plans, strategies, actions, and evidence support this concern.

Issue:
101 One agency cannot ignore the cumulative negative impact that another agency's actions are having on motorized access and motorized recreation. For example, the BLM cannot ignore cumulative negative impact of all of the closures that have occurred in the Helena National Forest during the evaluation of BLM projects in the area and vice versa.

Issue:
102 For the most part, adequate OHV opportunities do not exist. As OHV use becomes concentrated in smaller areas because of closures or restrictions, the frequency of encounters between motorized and non-motorized trail users increases dramatically. Resource damage can also results from use concentrated in smaller areas. Certainly with the acceptance of millions of acres of area closure by motorized recreationists, the use of the existing network of roads and trails including spurs for camping and exploring is reasonable. Additionally, we have seldom asked for any new routes and the level of use would justify many new routes.

Issue:
103 We are concerned that the BLM and Forest Service has created unnecessary significant negative impacts on both the human and natural by their policies that seeks to close as many motorized routes and opportunities as possible over the past 30 years. The cumulative effect of this policy is to crowd motorized recreationists into a relatively small number of areas and trails such the Whitetail-Pipestone area versus widely dispersed and adequate motorized recreational opportunities. The limited opportunities and resulting concentrated use is not the best alternative for either the human or natural environment. The limited opportunities and resulting concentrated use is not equitable for the public and especially when considering that these lands are intended by Congress to be managed for multiple-uses.

Issue:
104 The public has a need for more motorized access to dispersed camping spots in the project area including access for RV's trailers, and tent camping.

Issue:
105 The travel management process should be initiated with the scoping process and a full and adequate evaluation of all viable alternatives. All existing roads and trails available to motorized recreationists should be used as the starting alternative for all analyses and impact determinations. Establishment of this baseline alternative is crucial to the evaluation of all proposed impacts on motorized recreationists. Time after time the alternatives presented in the travel planning process do not include a reasonable motorized alternative. This seems to be a ploy to get the public to accept less right from the start. The process is predisposed in that a minimal number of motorized access and motorized recreational opportunities are presented as the preferred alternative from the beginning when the needs of the public are just the opposite. We request that the process he restarted and that all existing roads and trails which are available for use by motorized recreationists be adequately identified as the baseline alternative.

Responses

O3-99: Such analysis is beyond the scope of this RMP.

O3-100: Thank you for your comment.

O3-101: Please see response O3-124, paragraph 2.

O3-102: Please see response O3-124, paragraph 1.

O3-103: Please see response O3-124, paragraph 2.

O3-104: Thank you for your comment.

O3-105: Thank you for your comment. Please see response O3-124. The proposed action describes an adaptive travel management process. Refer to TM-D1.1.8.

Comments

O3 (Cont.)

Issue:

106 In an attempt to close as many existing roads and trails and possible, non-motorized interests keep trying to confuse the issues by suggesting that we are asking for illegally created trails. We are not. The term "illegal trails" is being used inappropriately. Many of the routes being referred by non-motorized interests as "illegal trails" were created in an era when cross-country travel was legal and access to public lands was encouraged without planning. We request that this term not be used by the agency to describe those legally created and used routes. We are asking for continued use of trails that are legitimately recognized by the agencies including those defined by the: 3-State OHV decision and route definitions (or similar definitions), RS-2477 access laws, all agency mapping including current travel plan mapping and historic and current visitor mapping.

Issue:

107 The need for more non-motorized hiking trails has not been demonstrated or documented. Non-motorized hiking trails in the project are not over-used. At the same time there is need for more motorized access and motorized recreational opportunities yet the dominant thinking within the agency is to close motorized roads and trails and increase non-motorized recreational opportunities.

We do not understand why the public's needs do not carry any weight in the process. Why is it acceptable to make decisions that fly in the face of public need? It appears to be done as conscious and organized efforts to eliminate a sector of the public from public lands. The needs of the public are being ignored in favor of a management agenda that is contrary to the needs of the public. Priorities for management of public land have swung to this ridiculous extreme. We request that the hidden agenda of closure of motorized roads and trails which is so contrary to the needs of the public be addressed and corrected.

Issue:

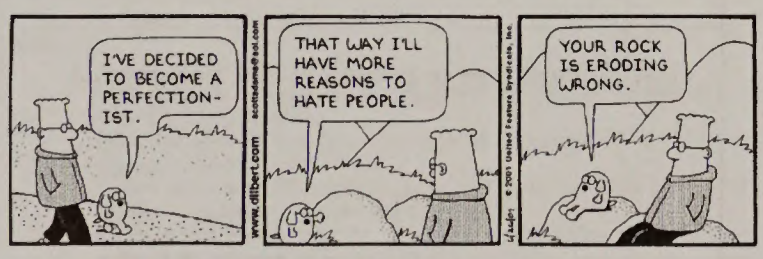
108 During a House Resources Committee hearing in San Diego during August, BLM California State Director Mike Pool, made a statement while being questioned by Congressman Bob Filner about closures of the Sand Mountain area to motorized recreationists. Mr. Pool indicated that he, as a public lands manager, is forced to manage lands to avoid litigation.

This is an often repeated example of "managing to avoid litigation." This has become a huge issue with the current management of public lands. Neither the butterfly nor the buckwheat plant is threatened or endangered at Sand Mountain. No "critical habitat" is defined or required. But the threat of appeals and lawsuits by environmental groups is real and that's what drives the decision-making. Motorized recreationists have not used lawsuits to the extent that the environmental groups have and consequently, motorized opportunities are being eliminated because they are a "lesser threat" of lawsuit and the overarching needs of the public are being ignored. A sense of magnitude for the number of current appeals filed by environmental groups can be developed by reviewing the Forest Service appeals listing at http://www.fs.fed.us/emc/applit/appeal_decisions.htm. The system is broken because it is neither reasonable nor equitable that motorized recreationists have to appeal and take legal action in order to get a fair decision.

Issue:

O3 (Cont.)

109 Pursuing environmental perfectionism is not an equitable goal for management of public lands. "The pursuit of perfectionism often impedes improvement" (George F. Will). The unyielding pursuit of environmental perfection could ultimately lead to radical changes in environmental laws and reduced public support for protection of the environment. It is important that a fundamental difference in doctrines be recognized. We believe that public lands are here for us to enjoy and use responsibly for the large number of purposes. The underlying doctrine of the extreme environmentalists on the other hand is that humans are intruders on and have no place in the natural environment. Expecting any or all of the public to be required to live with the consequences of uncompromising environmental perfectionism is an unreasonable expectation and it must be recognized as such. Additionally, the expectation of a static environment is unnatural. Ecosystems have been changing since the beginning of time and they should be expected to continue to change and adapt at both micro and global levels. We are equally concerned about protection of the environment but we request the pursuit of a reasonable and practical course of action, which will do more to protect the environment in the long-term. We request that the impacts associated with the pursuit of environmental perfectionism on the human environment be evaluated and that the cumulative negative impact of environmental perfectionism on the human environment be adequately considered.



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Issue:

110 There is a shortage of dispersed camping areas along all of our motorized routes. This can be confirmed by going out on any holiday weekend and trying to find a camp spot. In order to meet the needs of the public, camps spots and access to them must not be closed because of access and/or sanitation concerns. There are ways to mitigate any access concerns. Sanitation concerns can be addressed by constructing vault toilets or limiting camping to self-contained camping units which are the most poplar means of camping now. Additionally, campers that are not self-contained can be required to pack wastes out by using porta-potties or similar devices.

Issue:

111 In order to conserve energy, adequate motorized recreational opportunities are needed within a short distance of the cities and towns in our area. In order to conserve energy, we request that all reasonable OHV routes within short distance of urban areas be developed and that urban OHV trail heads be developed where ever public right-of-way allows access to public land.

Issue:

Responses

O3-106: We have not used the term "illegal trails." The 3-State OHV EIS does not apply to Idaho. To date, RS2477 has not been an issue of concern in the planning area.

O3-107: Planning issues were identified and alternatives were developed based on public input during the public scoping process (see Chapter 1).

O3-108: Thank you for your comment.

O3-109: Pursuit of environmental perfectionism was not a goal in this RMP.

O3-110: Please see response O3-13.

O3-111: Please refer to Maps 37-40. "Because of the scattered BLM land pattern, the CDAFO has a limited land base and transportation system with which to provide OHV opportunities. The USFS manages most of the federal lands within the planning area, and much of the Forest Service land is contiguous. Consequently, the opportunity for OHV use is largely on Forest System lands. Opportunities exist for the BLM to connect trail and roads in the existing and planned Forest System motorized road and trail system" (pg. 3-57). The proposed action designates routes that serve as trailheads or connections to the National Forest transportation system.

Comments

O3 (Cont.)

112 The evaluation and decision-making must also take into account that millions of acres of public land near the project area are designated national parks, monuments, wilderness and non-motorized areas where motorized access and recreation is not allowed or severely restricted. Therefore, the project area includes a significant number of non-motorized recreational opportunities that can be quantified in many ways including acres, miles of trails, an infinite number of miles of cross-country travel opportunities, and acres per visitor. At the same time motorized access and recreation is limited to a relatively small corridor and network of roads and trails. We request that the difference in visitor use between designated wilderness/non-motorized/exclusive-use lands and multiple-use lands be acknowledged and adequately addressed in the evaluation. We also request a motorized recreation alternative with a recreation opportunity spectrum (ROS) comparable to the surrounding ROS available for non-motorized recreationists be adopted as the "proposed action".

Issue:

113 We request a starting proposal that is based on all of the existing roads and trails available to the public. The process is required by NEPA to be neutral and a neutral process would include the fair presentation of all reasonable alternatives including all existing roads and trails plus new motorized opportunities required to meet the needs of the public. Why isn't this reasonable alternative being presented? We are concerned that the process is manipulating the public to believe that an entirely reasonable alternative based on existing roads and trails cannot be considered. Again, the process is predisposed towards closures right from the start and this is neither right nor equitable.

We request the full and fair disclosure of this information to the public. The starting benchmark could be considered deceptive. NEPA requires adequate disclosure of the potential impacts of a proposed action as stated in CEQ Sec. 1500.1 Purpose. *Mast important, NEPA documents must concentrote on the issues thot ore truly significont to the actian in question, rother thon omossing needless detail. It sholl provide full ond fair discussion of significant environmental impocts and sholl infarm decisionmakers and the public of the reosonable alternotives which would ovoid or minimize odverse impacts or enhance the quolity of the humon environment. Agencies shall focus on significont environmental issues ond olternotives ond sholl reduce paperwork ond the accumulotion of extroneous background doto. Statements shall be concise, cleor, ond to the point, ond shall be supported by evidence that the ogency hos mode the necessary environmental anolyses.* These requirements have not been met. We request that these deficiencies be addressed by developing a starting benchmark alternative that identifies all of the existing roads and trails available to motorized recreationists including non-system routes and those falling under some undefined definition of "unusable" and those additional routes required to meet the needs of the public.

Issue:

114 The evaluation needs to distinguish the difference in trail requirements and impacts between atvs and motorcycles and use that difference to justify keeping more single track trails open to motorcycles.

Issue:

115 Well-funded and organized non-motorized groups have systematically attacked and reduced economic and recreational opportunities associated with multiple-use of public land by ordinary citizens. This attack has included the introduction of an unreasonable expectation into all NEPA and land management processes. This unreasonable expectation is built around the concept that non-

O3 (Cont.)

sharing of public lands is acceptable and that conversion of multiple-use public lands to non-motorized, narrow-use or defacto wilderness lands is acceptable. Non-motorized special-interests do not use the existing roads and trails as much as the public uses them for motorized access. Non-motorized special-interests simply do not want anyone using them or want to share them with anyone else. This is not a reasonable expectation, it is inequitable to the public and these
115 unreasonable expectations must not be rewarded any further. It is not acceptable to reward people who seldom or never use a road or trail and allow them to shut out those that use them frequently.

The endorsement of this unreasonable expectation by agency actions has significantly impacted multiple-use opportunities on public lands and the public in general. The cumulative negative impact of this unreasonable expectation is significant. Adequate recognition of this trend and mitigation must now be implemented in order to counter the inequities that have been created by allowing this unreasonable expectation to have so much influence on our land use decisions.

Issue:

116 For the most part, the existing levels of roads and trails have acceptable natural environmental impacts because of the dispersed level of use that it allows. Mitigation can be implemented in those cases where there are environmental problems. The management trend of closure after closure is concentrating recreationists into smaller and smaller areas. The cumulative negative impact of the closure trend will either produce more impact than allowing use of the existing roads and trails or squeeze us completely out from public lands. We request that this fact be acknowledged and the trend of wholesale closures be reversed so that public land can be managed using the most sound natural and human environmental principles.

Issue:

117 It appears that the agencies do not want to; (1) accept or acknowledge the public need for OHV recreation, and (2) the responsibility as a public agency to provide adequate management for that recreation. OHV recreation is something that the public wants and enjoys and the agencies must get off the fence and accept the responsibility to develop OHV recreational resources and manage public lands for OHV recreation.

Issue:

118 The use of the name "Travel Management" for the process is deceiving the public. History has demonstrated that this is a closure and restriction process. New motorized roads or trails are seldom created by the process. When we ask visitors that we meet about the process they will either tell us; (1) that they expect the Forest Service to look out for their needs, or (2) that the Forest Service has already made up their mind on travel planning decisions and that it is pointless to participate in the process.

Issue:

119 The maps and figures are not easily understood. There are no identifiable or named features and no road and trail numbers on the maps. It is very difficult for the public to orient themselves and to interpret the proposed action for each specific road and trail. Therefore, the public cannot adequately evaluate the proposal and cannot develop comments with reference to specific roads and trails.

Issue:

Responses

O3-112: Please see responses O3-124, paragraph 1 and O3-45, paragraph 2.

Also, based on the number of comments received concerning or relating to recreation settings, Recreation Opportunity Spectrum (ROS) was added to Maps 20-23.

O3-113: Please see response O3-3.

O3-114: Please see responses O3-124, paragraph 1 and O3-45, paragraph 2.

O3-115: BLM did not have this "unreasonable expectation" during this planning process.

O3-116: Existing OHV management does not allow BLM to adequately manage OHV use to prevent degradation of other resources, or user conflicts. The preferred alternative is intended to allow for significant retention of OHV use areas while protecting other resources.

O3-117: Please see responses O3-124, paragraph 1 and O3-45.

O3-118: Comment pertains to the USFS, not BLM.

O3-119: Each map has been prepared according to BLM standards.

Comments

O3 (Cont.)

National Forest officials have stated that all challenging motorized roads and trails would be eliminated due to their concerns about hazards on those routes. For many of us, these are the very routes that we consider to have the greatest recreational value. Again, this is another example of predisposition and discrimination. Discrimination is to make a choice, a distinction. We all make choices, every day. Discrimination becomes illegal when choices made limit the possibilities of some groups or some individuals. Other forest visitors and their recreation opportunities are not subjected to this criterion. For example, this concern has never been used to limit the opportunities for hunters, fisher folks, woodcutters, equestrians, river floaters, campers, hang gliders, rock climbers, hikers, skiers, anyone driving anywhere in the forest, etc. We request that this unreasonable and discriminatory criterion be dropped immediately from the process and that the process be restarted without this criterion.

120

Issue:

The cumulative negative impact of multiple-use and motorized recreational closures (in acres of unrestricted area, miles of roads and trails, and recreational opportunities) by all past decisions including plans, and the creation of wildlife areas, wilderness, wilderness study areas, roadless areas, monuments, national parks and non-motorized areas has not been adequately recognized and it is significant. We have not seen the agencies tabulate the amount of motorized recreational opportunity lost during the past 35 ± years. Additionally, most of the past actions that have involved motorized closures have not included a comprehensive route inventory. Therefore, many motorized closures have occurred because the routes were not identified during the process and the process ended with a closed unless posted open conclusion. We have experienced the significant cumulative loss first hand. We estimate that today's motorized recreational opportunities are less than 50% of the level available in 1970.

Table 2
Partial list of Current and Immediate
Past Actions Affecting Multiple-Use/Motorized Recreation

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United States Court Of Appeals for the Ninth Circuit
No. 01-35690 D.C. No. CV-96-00152-DWM
All Resource Management Plans and Planning Actions
(inter-agency) Grizzly Bear Recovery Plan
(inter-agency) ICBEMP
(inter-agency) Northern Rockies Lynx Amendment
(inter-agency)3-States OHV Strategy
B-DNF Continental Divide Trail near Jackson, MT
B-DNF Whitetail Pipestone Travel Plan
B-DNF Forest Plan Update
B-DNF Analysis of the Management Situation
B-DNF Continental Divide trail near Feely
B-DNF Continental Divide trail near Whitetail-Pipestone
B-DNF Social Assessment
B-DNF Mussigbrod Post Fire Roads Management
B-DNF Trail #313 and Mormon Gulch Closure
B-DNF & BLM Flint Creek Watershed Project
Big Horn NF Forest Plan Revision
BLM All existing management plans and travel plans
BLM Blackleaf Project EIS
BLM Dillon Resource Management Plan
BLM Headwater Resource Management Plan
BLM Arizona Strip Travel Plan
BLM Bruneau Resource Area Travel Plan
BLM Escalante Grand Staircase Monument
BLM Missouri Breaks Monument
BLM Moab Resource Management Plans
BLM National OHV Strategy
BLM National Mountain Biking Strategic Action Plan
BLM San Rafael Travel Plan
BLM Sleeping Giant Travel Plan
BLM Whitetail/Pipestone Rec. Management Strategy
BLM Lake Havasu RMP
BLM Sustaining Working Landscapes Initiative
BLM Rocky Mountain Front Scenery Evaluation Project
BLM Kanab Resource Management Plan
BLM Miles City Resource Management Plan
Bitterroot NF Fire Salvage EIS
Bitterroot NF Post-fire Weed Mitigation EIS
Bitterroot NF Sapphire Divide Trail

O3 (Cont.)

Bitterroot NF Forest Plan Revision
Caribou NF Travel Plan
Custer National Forest Travel Plan
EPA Tenmile Creek Watershed Plan
Flathead NF Robert Wedge Post Fire Project
Flathead NF West Side Reservoir Post Fire Project
Flathead NF Forest Plan Revisions
Flathead NF Moose Post Fire Road Closures
Flathead NF Spotted Bear Road Closures
Gallatin NF 2002 Travel Plan Update
Helena NF Whites Gulch Closure
Helena NF Figure 8 Route Closure
Helena NF Blackfoot Travel Plan
Helena NF Blackfoot Water Quality Plan
Helena NF Cave Gulch Fire Salvage Sale
Helena NF Clancy-Unionville Plan
Helena NF North Belts Travel Plan
Helena NF North Divide Travel Plan
Helena NF Noxious Weed Plan
Helena NF South Belts Travel Plan
Helena NF South Divide Travel Plan
Helena NF Continental Divide National Scenic Trail
Humboldt Toiyabe NF Charleston-Jarbidge Road
Humboldt Toiyabe NF Spring Mountains NRA
Kootenai NF Bristow Restoration Project
Kootenai NF McSwede Restoration Project
Kootenai NF Forest Plan Revisions
Lolo NF Forest Plan Revision
L&CNF Little Belt Travel Plan
L&CNF Judith Restoration Plan
L&CNF Rocky Mountain Front Travel Plan
L&CNF Snowy Mountain Travel Plan
L&CNF Travel Plan update
Montana State Wolf Plan
Montana State Trail Grant Program PEIS
Montana State Trail Plan PEIS
Montana FWP Statewide Outdoor Recreation Plan
Nez Perce NF Travel Plan Revisions
NPS Salt Creek Road Closure
NPS Yellowstone Winter Plan (snowmobile closure)
Payette NF Travel Plan Revisions
Sawtooth NF Travel Plan Revisions
Shoshone NF LRMP
USFS All existing forest plans and travel plans
USFS National OHV Policy and Implementation
USFS Forest Plan Amendments for Grizzly Bear Habitat Conservation
USFS National Strategic Plan 2003 Update
USFS Roadless
USFS Roadless Rule II
USFS Roads Policy
USFS National Land Management Plan Revisions
USFWS Bull Trout Recovery Plan
USFWS Westslope Cutthroat Trout ESA
USFWS CMR National Wildlife Refuge Road Closures
USFWS Sage Grouse Plan
USFWS Rocky Mountain Front Conservation Easements

121

The projects listed in Table 2 have typically proposed to or have reduced motorized recreation from 20% to 100%. Additionally, each time an action involving travel management is updated it typically closes another 20% to 50% to motorized access and motorized recreation. The cumulative negative effect of past actions has contributed to a reduction in motorized access and motorized recreational opportunities over the past 35 ± years that is greater than 50%. The magnitude of the cumulative effect of the motorized closure trend must be identified and evaluated as a significant impact on motorized visitors.

We request an adequate evaluation of the significant cumulative loss in miles, acres, and quality of motorized recreation and access opportunities within public lands as required under 40 CFR 1508.7 and 1508.25, and guidelines published by the Council on Environmental Quality "Considering Cumulative Effects Under the National Environmental Policy Act". Table 2 is provided as a starting point of the projects that need to be considered as part of that evaluation.

Issue:

Because of the large number of projects affecting the public (Table 2) and the limited amount of time that individuals have including most working class citizens, agencies can not expect the level of public participation to be high. This does not justify taking recreation opportunities from the public including working class citizens.

122

Issue:

Responses

O3-120: Comment pertains to national forests, not BLM lands.

O3-121: Please see response O3-124, paragraph 2.

O3-122: Thank you for your comment. Please see response O3-49.

Comments

O3 (Cont.)

The forest, watershed and viewshed planning process tends to influence motorized access and motorized recreation in an undisclosed manner that is deceiving the public. For example, forest plans, watershed plans and view shed plans such as the Helena National Forest Plan, Beaverhead-Deerlodge National Forest Plan, Little Blackfoot River Watershed Plan, Tenmile Creek Watershed Plan and Scenery Evaluation Plan for the Rocky Mountain Front often set management goals for areas that will ultimately result in the elimination of motorized recreation yet motorized
123 recreationists are unaware that these actions will ultimately affect them. This back door process does not meet the NEPA requirement for adequate public disclosure of the impacts of the proposed action. Adequate public disclosure in these cases would require direct means of communication with motorized recreationists to inform them of the potential changes that will result from the respective plan. This process of non-disclosure has been used to effectively eliminate many motorized access and motorized recreational opportunities and contributes to the cumulative negative impact of closures on motorized recreationists. We request that the cumulative negative impact of past planning actions on motorized recreationists be adequately evaluated and considered during the decision-making process.

Issue:
If allowed to continue the trend of closure after closure of motorized access and motorized recreational opportunities will result in an extremely limited number of motorized access and motorized recreational opportunities. If allowed to continue to that end as proposed by current management schemes, motorized access and motorized will become so concentrated that the impacts on natural resources will become significantly greater than the alternative of continuing to
124 allow a reasonable level of motorized access and motorized recreation on all multiple-use lands. We believe that it is time that this trend to terminate motorized access and motorized recreation on public be evaluated. We request that the trend of cumulative closures, the cumulative negative impacts associated with that trend and the reasonable alternative of maintaining the existing level of motorized access and motorized recreation must be adequately addressed. We also request that the proposed action include an adequate mitigation plan to compensate for the significant impact from the cumulative effect of all past actions that have affected motorized access and motorized recreationists.

Issue:
Motorized visitors are continually losing significant recreational opportunities by conversion of multiple-use areas to non-motorized areas. We are greatly concerned about the cumulative negative impact associated with the reduction of multiple-use and OHV recreation opportunities because it is significant. We do not expect to have the freedom to go anywhere and do anything that we want. However, we are losing the basic opportunity to travel to places and experience outdoor recreation that we have enjoyed for decades. We are losing routes that fathers have taught sons and daughters and even grandchildren to ride on. People are calling us and asking where they can go to ride. What
125 are we supposed to tell them? The continual loss of motorized access and recreational opportunities is seriously degrading the local culture and quality of life. Public land is a cultural resource and access to the project area for many uses is part of the local culture. The decision for this project must consider the impacts that any closures will have on this culture.

We are opposed to any proposed action that further contributes to this cumulative negative impact on multiple-use and OHV recreationists because it is already significant. Recreation opportunities for multiple-use and OHV recreationists are being significantly reduced at a time when the need for these categories of recreation is growing. There is no reasonable justification for closing these lands

O3 (Cont.)

to multiple-uses. Management of public lands for multiple-use is the most equitable and responsive approach available to meet the needs of all citizens including motorized recreationists. We request
125 that the evaluation and proposed action adequately address this condition and not contribute further to this cumulative negative impact because it is already having a major impact on motorized recreationists.

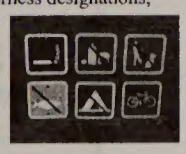
Issue:
The trend of closure after closure after closure after closure of motorized access and motorized recreational opportunities and the associated cumulative negative impacts of that trend is no longer
126 acceptable without adequate mitigation. A reasonable mitigation plan must be developed for each action in order to avoid contributing to significant cumulative impacts on motorized access and motorized recreationists.

Issue:
Current land management trends are applying wilderness standards and criteria to lands intended for multiple-use. For example, total National Forest area equals 191,856,000 acres (http://roadless.fs.fed.us/documents/feis/data/sheets/acres/appendix_forest_acres.html). Total designated wilderness/protected areas equal 42,351,000 acres or 28% of the total forest area. Additionally, there are other non-motorized designations that effectively eliminate motorized access and motorized recreation in large areas of the forest.

Other designations that preclude unrestricted multiple-uses include roadless areas which total 54,327,000 acres or 22% of the total forest area. First, the rules governing identified roadless areas clearly allow motorized recreation and roadless areas currently provide many important motorized recreational opportunities. However, in practice roadless areas are managed with restrictions that severely restrict multiple-use and access of those areas by the public. Therefore, the national forest area with severe access and use restrictions totals at least 96,678,000 acres or 50% of the total forest area.

127 Similar trends have occurred on lands managed by the Department of Interior (DOI) which total 507 million acres which is about one-fifth of the land in the United States. Acreages managed by each Interior agency include: 262 million acres managed by the Bureau of Land Management, 95 million acres managed by the Fish and Wildlife Service, 84 million acres managed by the National Park Service, 8.6 million acres managed by the Bureau of Reclamation, and 56 million acres managed by the Bureau of Indian Affairs. Statistics summarizing acres of multiple-use and restricted-use on DOI lands are not readily available to the public, however, a significant portion of these lands have limited motorized access and limited motorized recreational opportunities. DOI should adequately disclose these land use statistics to the puhlic including motorized recreationists as quickly as possible.

Therefore, the cumulative negative effect of the pre-Columhian scheme, wilderness designations, wilderness study areas, national parks, monument designations, roadless designations, non-motorized area designations, travel management, wildlife management areas and other restrictive management designations over the past 35 ± years have restricted the puhlic land area (USDA and DOI) available to multiple-use visitors seeking motorized access and/or mechanized recreational experiences (over 95% of the puhlic land visitors) to less than 50% of the total national forest and public land area.



Responses

O3-123: This comment concerns National Forest planning procedures and does not apply to the BLM. All processes used to plan and evaluate effects on these resources are described in the DRMP/EIS, which was prepared in accordance with the BLM Land use Planning handbook.

O3-124: The proposed action would establish a "limited" travel designation on most BLM land (Action TM-D1.1.1). To implement this RMP allocation, motor vehicle use would be restricted to certain designated routes (Except, cross-country travel by snowmobile would be allowed on frozen and snow covered ground on 63,373 acres). Use of some routes would be further restricted by season of use or class of vehicle. Implementation decisions to establish a network of designated routes are made in the RMP. Please refer to Maps 37-40. This action represents a shift away from "open" designations and unregulated use to more active management and regulated use. The action strikes a balance between the management requirements of the resources that are directly or indirectly affected by motorized travel with user needs for extensive motorized recreation access which is consistent with our multiple use resource management objectives. The action complies with legal requirements of laws such as the FLPMA, National Environmental Policy Act of 1969, and Threatened and Endangered Species Act as well as Executive Order No. 11644 (as amended by Executive Order No.11989). Also, the action is consistent with agency regulations and guidance contained at 43 CFR 8340, H-1601-1 Land Use Planning Handbook, Appendix C, and the BLM 2001 National Management Strategy for Motorized Off-highway Vehicle Use on Public Lands.

Environmental consequences are described in Chapter 4. Our analysis of impacts on recreation found that the proposed travel management actions would "alter some recreation users' experiences by limiting motorized opportunities" (pg.4-145). We also found that under the proposed action more area would be actively managed for recreation and "the transportation system would be maintained and expanded to meet related recreation goals" (pg. 4-156) The proposed action was found to "balance cumulative effects on general socioeconomics." (pg. 4-172).

O3-125: Please see response O3-124.

O3-126: Please see response O3-124.

O3-127: Please see responses O3-124, O3-5, O3-7, O3-45, paragraph 2, and O3-75.

Comments

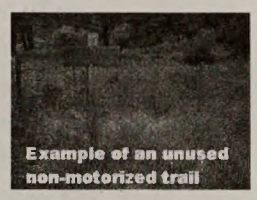
O3 (Cont.)

127 It is not reasonable to close this area to the majority of uses. In order to be responsive to the needs of the public all of the remaining (100%) multiple-use public lands should be managed for multiple-uses including motorized access and motorized recreation. Therefore, all public lands such as those in this project area must remain open as multiple-use lands in order to avoid contributing to the significant cumulative negative effect associated with the trend of converting multiple-use lands to limited-use lands. We request that the document and decision evaluate the needs of multiple-use and motorized recreationists and adequately evaluate the cumulative negative impacts that have resulted from inadequate evaluation in past actions. We also request that an adequate mitigation plan be included as part of this action to compensate for past cumulative negative impacts.

128 Issue:
We request that the over-arching management goals for all multiple-use public lands be to:
(1) Manage multiple-use lands for the greatest benefit to the public;
(2) Manage multiple-use lands in an environmentally sound and reasonable manner;
(3) Manage multiple-use lands in a way that avoids the pursuit of environmental extremism; and
(4) Manage multiple-use lands in a way that promotes the shared-use that they were intended for versus segregated-use or exclusive-use.

129 Issue:
Sign-in kiosks are routinely provided at wilderness trailheads to record the use of wilderness areas. We have never seen an equivalent facility or program and this lack of data puts motorized recreation at a disadvantage.

130 Issue:
The cumulative negative effect of management trends over the past 35 ± years has significantly increased non-motorized recreational opportunities while motorized recreational opportunities have been significantly decreased. Non-motorized recreationists have many choices while motorized recreationists have few choices. We request that the document evaluate the significant cumulative negative effects of this trend and that the decision be based on correcting this trend in order to equitably meet the needs of motorized recreationists.


Example of an unused non-motorized trail

131 Issue:
Agency staff has told us that they intend to focus on resource management issues. Issues related to the management of natural resources have received most of the attention during the evaluation while socio-economic issues surrounding motorized access and recreation are largely ignored. This lack of adequate recognition has led to the creation of significant socio-economic issues affecting the quality of the human environment for motorized recreationists. Land management agencies must acknowledge that public land has significant meaning and socio-economic value to the public. We request that all significant issues involving the human environment for motorized recreationists be adequately considered during the evaluation and decision-making process.

Issue:

O3 (Cont.)

132 Travel management documents have historically over-emphasized the potential positive impacts to some resource areas and under-emphasized the impacts to other resource areas both in numbers of pages devoted to a resource and in the conclusions. For example, in the Clancy-Unionville FEIS and DSEIS there are about 100 pages discussing potential positive impacts to wildlife and fisheries and less than 2 pages discussing negative impacts to motorized recreationists. This emphasis in the process has pre-determined that the human environment will be sacrificed for incrementally small benefits to some resources. The emphasis in the analysis does not reasonably consider incrementally small improvements (0-5%) to the natural environment against an incrementally significant impact (50%) to the human environment. We request that significant human environment issues involving motorized recreationists be adequately considered and weighed in the travel management process.

133 Issue:
The existing level of motorized access and recreation was developed by the community through years of involvement in direct relation to the need for motorized access and recreational opportunities. The community is accustomed and relies on this level of access and recreation. We request that the project area remain open to multiple-use and the public and that a reasonable preferred alternative be based on the existing level of motorized access and motorized recreation.

134 Issue:
Why use so many indirect attempts such as public meetings and open houses to gather feedback from motorized recreationists? Why not just go directly to motorized recreationists in the field and at club meetings and ask them? NEPA encourages direct coordination with the impacted public instead of a process tailor made for special-interest environmental groups.

135 Issue:
The dominant direction taken by the agencies is to use the travel planning process as a process to eliminate motorized access and recreation opportunities. Instead, the travel management process should be directed to meet the needs of the public for multiple-use, motorized access and motorized recreation on public lands. NEPA requires that agencies "Rigorously explore and objectively evaluate all reasonable alternatives...." [40 CFR 1502.14(a)]. We ask that you develop a preferred alternative that preserves and enhances multiple-use interests and motorized recreation.

136 Issue:
Managing public lands for exclusive-use by a few people or non-use is not in the best interest of the community. There are limited public lands available. We need to manage those lands for maximum communal benefit. We request that available uses of the project area be maximized as required by NEPA so that life's amenities can be enjoyed by as many people as possible.

137 Issue:
The over-arching intent of NEPA was not to eliminate humans from the natural environment as proposed by some. Instead, the intent of NEPA was to provide for a practical and reasonable protection of the natural environment while providing for a wide sharing of life's amenities. Note that NEPA specifically used the word "sharing". Sharing can only be accomplished by managing public land for multiple uses.

138 Issue:
The following statement on Page 117 of the Big Snowy EA is made in regards to cumulative negative effects and OHV recreation; *"It would appear that the combination of all these actions by*

Responses

O3-128: Please see response O3-3.

O3-129: Thank you for your suggestion. Site specific monitoring of visitor use is generally not performed in extensive recreation management areas as most of the BLM lands within the planning area are currently classified. Since the proposed action would establish additional special recreation management areas, visitor use monitoring actions would increase. Specific monitoring locations and methods are implementation actions that would be specifically addressed through activity planning. Also be aware that various types of traffic counters may be more effective at monitoring motor vehicle use levels than sign-in registers. The presence of a traffic counter may or may not be readily apparent or known to the user.

O3-130: Please see response O3-124, paragraph 2.

O3-131: A socioeconomic report has been prepared for this project, and is available for public review at www.cdarmp.com. Also refer to response O3-45.

O3-132: This and all comments submitted will be considered during preparation of the final RMP/EIS. Also refer to response O3-45.

O3-133: Please see responses above O3-124, O3-5 and O3-45.

O3-134: Please see response O3-202.

O3-135: Thank you for your comment. Please see response O3-124, O3-5 and O3-45.

O3-136: Please see response O3-3.

O3-137: Please see response O3-3.

O3-138: Thank you for your comment. Most of this comment does not directly relate to this RMP. Trends in recreation demands have been identified by the BLM and the proposed action structured to appropriately respond. Please see response O3-124, paragraph 2 and O3-45.

Comments

O3 (Cont.)

land management agencies may have a cumulative effect on opportunities for OHV recreation. It is impossible to quantify the effect, because the Forest Service does not have a State-wide tally of number of miles of roads and trails open to OHVs. Likewise, no one has an estimate of numbers of miles of roads and trails needed to meet the demand for motorized OHV recreation."

Page 262 of the Supplement to Big Snowy EA. *"In looking deeper into the issue of equitable opportunities, we found that the Forest Service reported 133,087 miles of trail nationally in 1996, but unfortunately there is no breakdown of how many miles of these trails are open to motorized travel versus non-motorized travel."*

Page 263 of the Supplement to Big Snowy EA. *"Region 1 of the Forest Service reports 18,024 miles of trail within just Montana. Unfortunately, none of these reports break down the information into miles of road or trail open to motorized use."*

These statements in the Supplement indicate that the agency was not able to assess whether the needs of motorized recreationists are being met because data does not exist. It appears that OHV user data is not being collected because the agency does not want to quantify or recognize OHV use and popularity. Our observations of recreationists on multiple-use public lands from 1999 through 2005 (available upon request) indicate that 96% of the visitors were associated with multiple-uses involving motorized access and/or mechanized recreation. This is also consistent with the Social Assessment for the Beaverhead-Deerlodge National Forest which reported that 97.45% of the visitors to Region 1 in year 2000 enjoyed recreation opportunities found in multiple-use areas.

138 These statements also indicate that the agency was not able to assess the cumulative negative impacts on motorized access and recreationists because data does not exist. This lack of information is a significant reason why motorized recreationists are suffering such significant reductions in recreation opportunity. Because data does not exist, agencies cannot quantify the individual and cumulative negative impacts of each motorized access and recreation closure on motorized recreationists. This lack of data and consideration is being used to the advantage of non-motorized interests because the agency is not recognizing the significant need for multiple-use opportunities including motorized access and motorized recreation.

If the present trend continues for a few more years, the loss of motorized access and recreation will be so significant that the collection of meaningful data will be precluded because motorized opportunities will be largely eliminated and motorized visitors will be permanently displaced (absent from public lands). Based on our observations, we estimate that motorized access and recreation opportunities have been reduced by at least 50% since the 1960's by the significant cumulative negative effect of wilderness designations, wilderness study areas, national parks, monument designations, roadless designations, non-motorized area designations, travel management, wildlife management areas and other restrictive management designations.

Motorized visitors are continually losing significant recreational opportunities by conversion of multiple-use areas to non-motorized areas. This is a significant impact that has occurred cumulatively by a process of thousands of individual closures. The lack of data does not justify imposing a significant impact on motorized recreationists. We request that this cumulative negative impact be addressed by the collection of data and the fair evaluation of the need for motorized access and motorized recreation. Additionally, we request that an adequate mitigation plan be included as part of this action to compensate for past cumulative negative impacts.

O3 (Cont.)

Issue:

139 Mailings and telephone interviews as done in past studies do not accurately locate the people visiting public lands. Our field observations of trail use in multiple-use areas and the Social Assessment for the Beaverhead-Deerlodge National Forest have found that over 96% of the visitors were associated with multiple-uses that involved motorized access and/or mechanized recreation. We request that effective methods be developed to involve and account for motorized access and mechanized recreationists.

Issue:

140 There was considerably more human activity in the project area during the period from 1870 to 1940 when mining, logging, homesteading, ranching, and pioneer activity was high. Therefore, there is considerably less human activity and human-caused impact now than during any period in the last 130 years. We request that this trend be in included in the analysis. This trend also contributes to the cumulative negative impact of less access and less use of public lands that has become significant. We request that the decision-making reverse the trend of less access and less use of public lands by including an adequate mitigation plan as part of this action to compensate for past cumulative negative impacts on motorized recreationists.

Issue:

141 Motorized recreation is recognized as one of the fastest growing activities on federal lands within this country yet recreation opportunities for motorized recreationists are always being reduced.

Issue:

142 National Forests and BLM lands are effectively being managed as "National Forest Park" or "limited-use" or "exclusive-use" areas because of the volume of lawsuits filed by environmental groups. This is contrary to the needs of the public who enjoy or depend on lands managed for multiple-uses including motorized access and motorized recreation. The concepts of "Multiple-Use" and the "Land of Many Uses" need to be restored as envisioned by the first Forest Service Chief, Gifford Pinchot who directed that "…. National Forest lands are managed for the greatest good for the greatest number of people…". This is no longer the case and, consequently, the Forest Service no longer has any credibility with the public. We request that the document address restoration of these concepts and steps be taken to restore reasonable multiple-use management and decision-making to public lands.

Issue:

143 A CNN poll (available upon request) asked the question "Do you think off-road vehicles (ORVs) should be banned from unpaved areas of natural forest land?" and found about 15% said yes and 85% did not think ORVs should be banned. A poll taken by Backpacker magazine (http://www.backpacker.com/poll/0,3189,,00.html) found that out of 21,000+ responses 96% of the respondents answered "yes" to the question "Should off-road vehicles be allowed in national parks?"

Therefore, elimination of motorized access and recreation on public lands is not widely supported. We request that the document and decision-making reflect citizens' support for motorized access and recreation.

Responses

O3-139: Please see responses O3-17 and O3-49.

O3-140: Please see responses O3-124, O3-5 and O3-45.

O3-141: Please see response O3-45.

O3-142: Please see response O3-3.

O3-143: Please see responses O3-45 and O3-49.

Comments

O3 (Cont.)

144 Issue:
Forest Service and BLM law enforcement has taken the position that OHVs cannot legally ride on forest or BLM roads unless the road is designated dual-use. Cumulative decisions have closed OHV trails to the point that there is not an inter-connecting network of routes. At the same time, the agencies have not designated a functional network of dual-use routes to inter-connect to OHV routes. Therefore, these closure decisions are forcing the OHV recreationists to ride non-designated dual-use routes illegally. The proposed action must include these designations in order to provide a network of OHV routes with inter-connections, where required, using dual-use roads in order to be functional. This will allow OHV enthusiasts to operate legally on forest and BLM roads. We request that a system of dual-purpose roads, and OHV roads and trails that interconnect be one of the primary objectives of the travel management plan and that this objective be adequately addressed in the document and decision.

145 Issue:
The continual closure of motorized trails has forced OHVs to be operated on forest roads in order to provide a reasonable system of routes and to reach destinations of interest. The lack of dual-use designations on forest roads then makes OHV use on these routes illegal. The cumulative negative effect of motorized closures and then combined with the lack of a reasonable system of roads and trails with dual-use designation have not been adequately considered in past evaluations and decision-making. We request that all reasonable routes be designated for dual-use so that a system of roads and trails can be used by motorized recreationists. Additionally, we request that the cumulative negative effect of all past decisions that have adequately considered dual-use designations be evaluated and considered in the decision-making and that this project include an adequate mitigation plan to compensate for inadequate consideration in the past.

146 Issue:
Travel management started from the beginning with a proposal to close the majority of existing roads and trails to motorized recreation and access with the exception of a few major roads. This practice forces motorized visitors and recreationists to start with the worst case scenario and then expend great effort (that is not very successful) to add routes currently in use back into the process. This practice places an enormous burden on motorized visitors just to maintain the status quo. This process, in effect, provides preferential treatment for non-motorized visitors who do not have to identify routes and challenge the process to protect their recreation opportunities. We request that the travel management process be practiced in a manner that does put motorized visitors at a disadvantage.

147 Issue:
A fair travel management process would start with a comprehensive inventory of all existing motorized routes in use by the public. Then, in order to avoid further cumulative loss and significant impact on motorized access and recreation opportunities, we request that the travel management process include a preferred alternative based on preserving all existing motorized routes. Existing motorized roads and trails have been around for decades and have not caused any significant problems. Therefore, it is not reasonable to close a significant number of existing motorized routes. Any significant negative impact associated with a specific motorized route should be the basis for an evaluation to close or keep that route open and should carefully consider all reasonable mitigation measures. The cumulative loss of motorized recreation and access opportunities within public lands has been significant. In order to avoid further cumulative negative impacts, we request that the

O3 (Cont.)

147 majority of existing motorized routes remain open and the closure of an existing motorized route be offset by the creation of a new motorized route.

148 Issue:
Oftentimes, many of the motorized roads and trails proposed for closure are primitive roads and trails that provide the ideal experience sought by motorized visitors. We request that the analysis adequately evaluate the type and quality of experiences that motorized visitors enjoy and want maintained in the area.

149 Issue:
Motorized recreationists prefer an interesting assortment of loop and spur routes for a variety of purposes. Each road and trail should be inventoried and viewed on the ground to determine its recreational value and any significant problem areas that require mitigation measures. Each road and trail should be evaluated for its value as a motorized loop or connected route. Each spur road and trail should be evaluated for its value including: a source of dispersed campsite(s), exploration opportunities, destination such as an old mine and viewpoint or as access for all multiple-use visitors. Every problem has a solution. Every impact has a mitigation measure. We request that travel management alternatives be developed with the objective of including as many roads and trails as possible and addressing as many problems as possible by using all possible mitigation measures.

150 Issue:
Motorized trail recreationists have been very reluctant in the past to give up the "open" designation because we believe we may lose legitimate and historic trails that are located in "open areas" that are crucial to loop opportunities. Our fear has been, and remains, that the agency will define key trails we currently utilize as "user created" because they are not on a current travel plan or forest map and because they are not identified that they will be closed. Many of these trails are recorded on earlier maps but others are not. While in fact they may have been created to access an activity such as mining or logging in the late 1800's or early 1900's when these uses and activities were more popular.

151 Issue:
Motorized recreationists would accept area closure (restriction of motorized vehicles to designated routes and elimination of cross-country travel) when reliable documentation demonstrates that it would provide measurable and significant improvement to the natural environment in exchange for a reasonable number of designated motorized routes. We request that the analysis develop a preferred alternative with a reasonable number of designated routes in exchange for the environmental improvements that have been realized by motorized visitor's acceptance of millions of acres of area closure under the 3-State OHV Plan.

152 Issue:
In most locales, visitors to public lands have given up motorized cross-country travel opportunities and accepted millions of acres of area closure. Therefore, motorized recreationists cannot travel cross-country using motorized vehicles and motorized recreational opportunities are limited to existing roads and trails that are open to motorized use. At the same time, non-motorized recreationists can hike cross-country. Therefore, hiking opportunities are unlimited.

Issue:

Responses

O3-144: The state of Idaho regulates registration and equipment requirements for highway and off-highway motor vehicles. On unpaved roads that are managed by a public land management agency the following are required:

- Valid driver's license
- Valid registration as a motor vehicle (unless License plate
- Valid liability insurance
- Proof of liability insurance
- Brake light
- Helmet if under age eighteen (motorcycle only)
- Muffler and spark arrestor
- Headlight after dark/poor visibility
- Taillight after dark/poor visibility.

To operate on highways which includes paved roads on public land management agency lands there are additional requirements for:

- Horn audible at 200 feet
- Muffler – unaltered and in good working condition
- Mirror showing roadway 200 feet behind the vehicle

O3-145: Please see response O3-144.

O3-146: Thank you for your comment.

O3-147: Please see responses O3-124, O3-5 and O3-17.

O3-148: Please see responses O3-124, O3-17 and O3-45.

O3-149: Please see responses O3-12 and O3-45.

O3-150: Please see responses O3-124 and O3-17.

O3-151: The 3-state OHV plan does not apply to Idaho.

O3-152: Thank you for your comment.

Comments

O3 (Cont.)

153 In most locales, public land visitors have given up motorized cross-country travel opportunities and accepted many acres of area closure. However, most often motorized recreationists have not been given credit for the benefits associated with the implementation of cross-country travel restrictions and area closures. Then along comes travel planning which seeks to further restrict motorized access and motorized recreation. We request that these trends and the significance of the cumulative negative impacts of these trends on motorized access and motorized recreationists be evaluated and that motorized trail projects be undertaken to mitigate the cumulative negative impacts on motorized access and motorized recreationists.

Issue:
154 Most of the motorized roads and trails in the project area have served as important public access routes since the turn of the century. This is demonstrated by the number of historic mines and structures that are located along these routes. We have observed that these travelways are currently significant recreation resources for motorized visitors in the area including ATV, motorcycle, and four-wheel drive enthusiasts. Many of these travelways have right-of-ways as provided for under the provisions of Revised Statute 2477. These roads are shown on older mapping sources including: aerial photographs, 15-minute USGS quadrangle sheets, and older county maps. The cut and fill sections and obvious roadbed indicate that these roads were constructed and used by the citizens for access to the forest. RS 2477 was created to provide adequate access to public lands. Now this public access is being eliminated. We request that these travelways remain open based on; (1) their history of community access, (2) the access that they provide to interesting historical sites, and (3) their importance to community access. We request that the document evaluate all of the issues surrounding RS 2477 including the cumulative negative impact of all past closures of RS 2477 routes which has become a significant impact on motorized recreationists.

Issue:
155 On July 26, 1866, as part of a move to grant access to western lands, the United States Congress enacted the 1866 Mining Act, section 8 of which granted a right-of-way to all persons over unreserved federal lands when it stated "the right-of-way for the construction of highways over public lands, not reserved for public uses, is hereby granted". In 1873, the 1866 grant was re-codified into section 2477, Revised Statutes of the United States, and rights-of-way granted by that section have since become known as the "RS 2477 rights-of-way".

Throughout the later half of the 19th century and the first three-quarters of the 20th century, the use of "RS 2477 rights-of-way" over federal land in the western United States became a standard method of legal access across federal lands for commercial, industrial, and recreation pursuits to such an extent that the use of the RS 2477 rights-of-way has become an inherent part of western heritage and a capital asset for the public that should be preserved for future generations.

The use of RS 2477 rights-of-way over nearly a century has resulted in an extensive body of case law in the state and federal courts, in which owners of various types of rights-of-way have competed with holders of RS 2477 rights-of-way and in which the availability of those various rights-of-way has been decided by the courts, including the modern State Supreme Court as well as the federal 9th Circuit Court of Appeals, in such cases as Robertson v. Smith, Supreme Court Montana Ten., 1871;

O3 (Cont.)

Butte v. Mikosowitz, 39 Mont. 350, 102 P. 593, (1909); Moulton v. Irish, 67 Mont. 504, 218 P. 1053 (1923); and Shultz v. Dept. of Army, 10 F.3d 649 (9th Cir. 1993).

RS 2477 rights-of-way have been given a liberal interpretation by state and federal courts in those judicial decisions interpreting what constitutes a "highway" within the meaning of RS 2477, those judicial opinions holding that even the barest foot trail could qualify as a "highway" and that no particular way across federal lands has even been identified, it being sufficient that travelers used an area of federal land as a method of access between two geographic points. After 110 years of public use of RS 2477 rights-of-way, the U.S. Congress repealed the most recent version of RS 2477, 43
155 U.S.C. 932, but that repeal was, by 43 U.S.C. 1701, specifically made subject to valid rights-of-way existing as of the date of repeal which was 1976.

Schiller, chairman of the High Desert Multiple-Use Coalition, told the Kern County Board of Supervisors at a meeting held on February 19, 2002 to address RS 2477 issues that "the roads represent our custom, our culture, our economy and our family traditions. I know it's been argued that this is about OHV uses and off-highway vehicles," said Schiller. "It is really about access" .We request that any routes proposed for closure and in existence before 1976 be considered as having RS 2477 rights-of-way in order to provide citizens with access to public lands.

Issue:
156 The maps used in the environmental document should be familiar and easily interpreted by all citizens. The public is most familiar with Forest Visitors Maps and other common visitors maps. The environmental document mapping should follow the guidelines required by 40 CFR 1502.8 which states that "*Environmental impact statements shall be written in plain language and may use appropriate graphics so that decision-makers and the public can readily understand them*". Many visitors who traditionally use roads and trails in the project area may not comment during travel management process unless they understand which roads and trails are proposed for closure. This lack of understanding could lead to resentment and poor support of the closures by the community because a wide range of needs have not been adequately addressed. We request that mapping identify streams, road numbers, trail numbers, landmarks and key topographic features in a manner that all citizens can easily interpret.

Issue:
157 Many citizens have not understood the extent of the motorized closures proposed in past travel management processes. This lack of understanding is due to inadequate communication in many forms including mapping, documents, and on-the-trail public involvement. We are concerned that this lack of public understanding and buy-in will lead to poor support and resentment of closures. We request that public understanding and buy-in be stressed throughout the process.

Issue:
158 Site-specific analysis should be provided for every road and trail so that the benefits of keeping each motorized travelway is adequately addressed and accounted for in the decision. Site-specific questions will need to be discussed during the process. We request that the mapping be sufficient to allow site-specific analysis.

Issue:
Positive impacts to the environment in areas such as fisheries, wildlife habitat, sediment reduction, and noxious weeds are largely based on personal judgment or predictive models. These models are

Responses

O3-153: Please see responses O3-124, paragraph 2 and O3-45.

O3-154: Please see Chapter 1, Page 1-8, Planning Criteria 1.5.4 "The RMP will recognize all valid existing rights."

O3-155: Please see Chapter 1, Page 1-8, Planning Criteria 1.5.4 "The RMP will recognize all valid existing rights."

O3-156: All maps have been produced in accordance with established BLM standards, which are in use on all BLM documents being currently produced. Also see response O3-200.

O3-157: BLM's extensive public outreach efforts and opportunities for public involvement are described in Chapter 5 of the RMP.

O3-158: The RMP is intended to provide program-level guidance on the breadth of planning issues within the CDAFO. Site-specific analysis will be performed during project-level planning.

Comments

O3 (Cont.)

not calibrated or based on data from the study area. All models are wrong, so honest modelers first report the expected uncertainty of the model and then the predictions. There are no case histories and very little data to back up any of the predictions.

All too often actions have been enacted based on proclaimed benefit to the environment and without any tangible evidence or follow-on monitoring to document whether proclaimed benefits occurred or not. All too often these same actions have produced significant negative impacts on multiple-use interests. Significant recreational opportunities have been taken from multiple-use and motorized recreationists based on theoretical environmental improvements that may never happen. This lack of accountability is not acceptable.

We request that sufficient background data be collected to quantify the existing conditions in the resource areas of interest. Then, if a motorized closure is enacted, sufficient data should be collected to demonstrate whether or not there was significant improvement to each resource area. If significant measurable improvement cannot be demonstrated, then, in order to be accountable, motorized closure actions should be reversed. In other words, the public needs to know how the decision made, the data on which it was based on including the source, and whether the data was adequate to substantiate the claimed environmental improvements.

Additionally, we request that the cumulative negative impact from all past actions based on inadequate documentation and accountability for improvements be determined. Again, if significant measurable improvement cannot be demonstrated, then, in order to be accountable, motorized closure actions must be reversed.

Issue:

159 Past analyses of the affected environment and environmental consequences have failed to adequately recognize that resources such as fisheries, wildlife, and sediment production are affected far more by nature than by motorized visitors. Drought has a significant impact on fisheries, OHV recreation does not compare. Erosion and other activities of interest such as the spread of noxious weeds occur naturally and at significant rates. For example, floods, fires, drought, and wildlife diseases have historically created significantly greater impacts than motorized visitors have. In many cases it is not reasonable to deem as unacceptable the relatively small increase caused by motorized recreation on natural activities. Comparing man-caused impacts to natural impacts is a reasonable approach that should be used to test for the significance of impacts and improvements. The improvements to the natural environment from this action are not significant when compared to the naturally occurring impacts. The picture shows Copper Creek near Lincoln, Montana following the August 2003 fire. Prior to the fire the Forest Service was concerned about the public camping next to the creek. The potential impacts from the public camping along this stream compared to this fire are insignificant yet closure of this recreation opportunity was being considered. Why are there so many double-standards in the impact analyses? We request that all impact analyses in all resource areas compare the relative magnitude of man-caused impacts to the background level of naturally occurring impacts or management actions such as the "Let it burn" policy.

O3 (Cont.)

Issue:

Impacts should be evaluated in a fair and unbiased manner and with a relative sense of magnitude. For example, if natural events including floods, wildfires, and their associated impacts are natural and acceptable as stated by some agency personnel and environmental groups, then (in order to be consistent and equitable) impacts from OHV recreation should be compared in relative magnitude to the impacts associated with floods, wildfire, and other natural events. We are concerned about comments about OHV recreation being such a significant threat to public lands (Bosworth speech, January 16, 2004). The impact of OHV recreation in our area compared to the negative impacts from just one of the 6 significant fires in our area is miniscule (http://www.helenair.com/articles/2004/09/30/top/a01093004_01.prt). Therefore, the impact of recreation should be fairly compared to the impact of floods, wildfire, and other natural events on all resource areas. These comparisons should also include natural levels of noxious weeds, deforestation, erosion and sediment production, and loss of organic material.

The use of soil erosion as a reason to close motorized recreational opportunities is an example of the predisposition that exists per the following example. Soil erosion associated with fires that have burned severely has been reported in the range of 50 tons per hectare[4] (20 tons per acre). Nearly all fires increase sediment yield, but wildfires in steep terrain produce the greatest amounts (12 to 165 ton per acre per year, 28 to 370 Mg per hectare per year) (table 5 and figure 11)[5]. This soil loss occurs over the burned area due to the lack of vegetative cover to hold the soil in place on steep slopes during precipitation events and increased peak rates of runoff. Flood peak flows after wildfires that burn large areas in steep terrain often produce significant impacts. Peak flow increases of 10 to 100 times are common, but some have been measured as high as 2,300 times pre-fire conditions[6]. Since 1994 the acres burned nationally have ranged from 2.3 to 8.4 million acres and averaged 4.8 million acres. At a typical sediment yield of 20 tons per acre per year, about 96,000,000 tons of sediment has been produced by fires or about 9,600,000 dump truck loads. On a more local basis in the Helena National Forest several hundred thousand acres have burned since 1988. Sediment production associated with these fires would equal 4,000,000 tons or 400,000 dump truck loads. Sediment production associated with motorized recreation cannot begin to compare to this magnitude and, therefore, it is not reasonable use sediment as a basis to close motorized recreational opportunities when impacts from "Let it burn" and other management policies are a million times greater and considered acceptable.

160

Monitoring and evaluation must be made consistent with and pursuant to the best available scientific information, techniques, and methods, and any conclusions based on these evaluations must be statistically significant.

Table 2 National Interagency Coordination Center Annual Fire Data

Year	Fires	Acres
1994	114,049	4,724,014
1995	130,019	2,315,730

[4] http://news.bbc.co.uk/1/hi/world/europe/3164843.stm

[5] Robichaud, Peter R.; Beyers, Jan L.; Neary, Daniel G. 2000. **Evaluating the effectiveness of postfire rehabilitation treatments**. Gen. Tech. Rep. RMRS-GTR-63. Fort Collins: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. 85 p. http://www.fs.fed.us/rm/pubs/rmrs_gtr63.pdf

[6] POST-WILDFIRE WATERSHED FLOOD RESPONSES, Daniel G. Neary*, Gerald J. Gottfried, and Peter F. Ffolliott, USDA Forest Service, Rocky Mountain Research Station, Flagstaff, AZ School of Renewable Natural Resources, University of Arizona, Tucson, AZ http://www.rmrs.nau.edu/lab/4302/Publications/Neary_65982.pdf

Responses

O3-159: All analysis was conducted using the latest data available, which indicate that many of the planning issues faced in the CFO are influenced by human activity. Natural effects and trends are described in Chapter 3: Affected Environment, which was used in analysis of the environmental consequences of the alternatives.

O3-160: All use and resource categories are evaluated on their own merits and in combination with other resources. Use and resources categories are given more or less management priority based on public input and the input of BLM resources staff regarding the potential for effects arising from that type of use. OHV use was one of the resource uses commented on most during the public scoping period and has emerged as a large management topic as the numbers of OHV users has increased greatly over the life of the previous management plan.

Also see response O3-124.

Comments

O3 (Cont.)

1996	115,025	6,701,390
1997	89,517	3,372,616
1998	81,043	2,329,709
1999	93,702	5,661,976
2000	122,827	8,422,237
2001	84,079	3,555,138
2002	88,458	7,182,979
2003	57,578	3,815,757

Source: National Interagency Coordination Center
2003 Figures current as of 11/07/03
http://www.nifc.gov/fireinfo/nfn.html

160 In a fair and unbiased evaluation, the source of the impacts (natural versus human caused) should not be a factor. In a fair and unbiased evaluation, relative impact associated with natural events including floods and wildfires is thousands of times greater than impacts associated with timber harvests and OHV recreation, yet proposed action involving timber harvests and OHV recreation are considered to have unacceptable impacts. The absence of a rational connection between the facts found and the choice made has been defined by the courts as arbitrary and capricious (Natural Resources. v. U.S., 966 F.2d 1292, 97, (9th Cir.'92)). A clear error of judgment; an action not based upon consideration of relevant factors and so is arbitrary, capricious, an abuse of discretion or otherwise not in accordance with law or if it was taken without observance of procedure required by law (5 USC. 706(2)(A) (1988)). We request fair and unbiased evaluations and judgments during this evaluation and decision-making.

Issue:
161 The amount of sediment production from federal lands is relatively small compared to sediment production that ultimately reaches stream courses from non-federal lands. For example, the Bear Canyon sediment study in the Gallatin National Forest found that sediment production at the forest boundary was on the order of 3 tons per year while the sediment production at the mouth of the stream was on the order of 35 tons per year. Therefore, the sediment production from the federal lands is reasonable and any environmental benefit to the stream must be focused on the non-federal lands downstream.

Issue:
The sediment analysis conducted for this project assumed that all of the increased sediment produced by public access and recreational use can be transported or moved. However, many sedimentation evaluations have found that the amount of sediment moved is often limited by the sediment transport capability of the stream. Hans Albert Einstein stated "The coarser part of the load, i.e. the part that is more difficult to move by flowing water, is limited in its rate by the transporting ability of the flow between the source and the section"[7]. Therefore, the transport capacity of the project streams must be established and compared to the amount of historic sediment transport to determine if there is any additional capacity to transport the increased amount of sediment predicted by the project evaluation. This basic check should be conducted so that the increase in sediment production and associated negative impacts are note over-estimated to the disadvantage of public use and motorized recreation.

[7] Einstein, H.A., 1964, "Sedimentation, Part II. River Sedimentation," Handbook of Applied Hydrology, V.T. Chow, Section 17, McGraw-Hill Book Co., NY.

O3 (Cont.)

Issue:
162 The estimated reduced annual volume of sediment production attributed to proposed motorized closures versus the annual volume of runoff is an actual reduction in sediment production on the order of 10 or less parts per million. This level of predicted sediment reduction should not be considered significant especially when compared to sediment production from natural events discussed above. This level of predicted reduction in sediment production should not be used as the basis for motorized closures.

Issue:
It is time to implement a practical and sensible application of NEPA. The intent of NEPA when it was created in the late 1960's was to better incorporate environmental concerns into proposed actions while still meeting the needs of the public. Up until that time, consideration of the natural environment was not always required and impacts to the natural environmental were not always adequately considered. A significant correction has been made since then. Concerns with the natural environment now receive considerable attention and natural resource issues are adequately considered for nearly all proposed actions. Additionally, many ways and means have been developed to mitigate impacts to the natural environmental and still meet the needs of the human environment.

163 There may have been a time when NEPA decisions struck an ideal balance between the natural and human environments but now NEPA is used by environmental organizations to rigorously pursue environmental perfectionism. Environmental perfectionism occurs when significant impacts are imposed on the human environment in return for relatively minor or unaccountable improvements to the natural environment. The pursuit of environmental perfectionism has contributed to the significant cumulative negative effect of converting public land from the land of many-uses or multiple-uses to the land of limited-use or exclusive-use. The mindset of environmental perfectionism has pushed agencies far beyond the original intent of NEPA to better protect the natural environmental from proposed actions. The pursuit of environmental perfectionism is attacking one of the basic requirements of NEPA to "achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities" (Public Law 91-190, Title I, Section 101 (b) (5)). The wording of NEPA was carefully chosen and was intended to produce a balance between the natural and human environment. Practice and interpretation since the law has strayed far from that intent. We request the development and implementation of a practical and sensible alternative that achieves a balanced and wide sharing of life's amenities as originally envisioned under NEPA.

Issue:
164 The transport mechanism for noxious weeds includes all visitors and uses of public lands including hikers, equestrians, and cattle grazing in addition to motorized recreationists. Many events including fire, floods, and the importation of invasive species also contribute to noxious weed problems. For the most part, vehicles do not have a surface texture that will pick up and hold noxious weeds seeds. Transport mechanisms based on hair, fur, manure, shoes, and fabrics are more effective that the smooth metal and plastic surfaces found on vehicles. Additionally, motorized recreationists practice the "Wash your Steeds" policy. However, closures due to noxious weed concerns are only placed on motorized recreationists.

Responses

O3-161: Sediment from federal lands covered by this RMP may affect stream habitat quality for listed species of fish within the planning area as well as downstream of the planning area. Therefore, according to the ESA, sediment input must be managed.

O3-162: Numerous factors are considered when deciding on route designations. Sediment production is only one of those factors.

O3-163: Alternative D is the type of alternative that you are describing.

O3-164: Commenter is correct that there are numerous sources of weed seed transport. Therefore, several strategies have been implemented or suggested to reduce the possibility of this occurrence, including public education and pre-washing for service vehicles. All users are held responsible for reducing weed seed transport to the degree possible.

Comments

O3 (Cont.)

164 We have observed an equal amount of noxious weeds in non-motorized areas as there are in motorized areas. We request that the document make a fair evaluation of all sources and uses that contribute to the noxious weed problem including hikers, mountain hikers, equestrians (non-use of weed-free hay), etc. The document should also fairly evaluate how natural processes and wildlife spread noxious weeds. The document should include a balanced discussion of the noxious weed problem. The discussions, decisions and measures used to mitigate noxious weeds should be applied impartially to all visitors and with a realistic representation of noxious weeds natural ability to spread versus a relative magnitude for every activity's contribution.

Issue:

165 OHV owners in Montana, as part of their vehicle registration, contribute $1.50 to a noxious weed abatement program. Non-motorized visitors do not contribute to a weed abatement program. We request that the analysis be based on a balanced discussion of the noxious weed problem. The discussions, decisions and measures used to mitigate noxious weeds should recognize the relatively minor impact that OHVs have on the noxious weed problem and credit OHV visitors for contributing to a program to control noxious weeds. Additionally, this is another example of predisposition because motorized recreationists have not been given credit for the positive action that they have taken and we have only been penalized for our past cooperation and the initiative taken to control noxious weeds.

Issue:

166 The environmental document should accurately address the significant negative impacts associated with disturbing existing stable roadways in order to obliterate the existing roadbed. A reasonable alternative would be to reclassify the road to either restricted-width or unrestricted-width motorized trail. We request that the preferred alternative make practical use of this management tool and the benefits that it provides including reduced sedimentation impact, reduced fisheries impact, reduced noxious weed impact, much less construction cost, reduced road inventory, reduced road maintenance and increased opportunities for motorized recreationists. Reclassifying roadways to restricted- or unrestricted-width motorized trail also avoids contributing to cumulative negative impacts on motorized recreationists.

Issue:

167 Current management directives seek to aggressively decommission non-beneficial or unclassified roads, reduce the existing backlog on road maintenance and reconstruction, and reduce the resource impacts of the current roads network. The Forest Service in the Roadless Rule EIS reported that the backlog of forest road maintenance was about $8.4 billion. This estimate includes many primitive roads and trails that motorized recreations would prefer not to have improved except for mitigation measures such as water bars and reroutes to avoid sensitive environmental areas. The challenge and recreation value of these types of primitive roads and trails is what most motorized recreationists are looking for. Therefore, this maintenance effort is overstated and a more reasonable alternative would be to incorporate reasonable mitigation measures and convert roads to unrestricted-width or restricted-width trails to provide motorized recreation opportunities and then remove these roads from the roads inventory. We request that this reasonable alternative be included as part of the preferred alternative.

Issue:

O3 (Cont.)

168 Considerable trail and environmental mitigation work could be accomplished by programs similar to AmeriCorps and Job Corps if they were given that direction and organized to provide that assistance.

Issue:

169 We understand the operation and maintenance budget constraints facing the agency. However, lack of maintenance funding cannot be used as a reason for motorized closures because there is significant gas tax funding that is not being returned to motorized recreationists (see comments on gas tax issues). Motorized recreationists are willing to work in collaboration with the agency to obtain trail and OHV funding for the project area. Additionally, motorized recreationists can be called upon to help with the maintenance of trails in the project area. In many cases motorized recreationists have been providing trail maintenance for many years and are quite willing to continue in return for continued access.

Issue:

170 Most environmental documents have not taken into consideration the fact that motorized multiple-use designation serves all recreation activities, instead of the few served by non-motorized/wilderness designations. For example, motorized roads and trails allow access to dispersed camping sites for RVs, the collection of firewood, access for fishing and hunting, target shooting, access for bird and wildlife viewing, walking and bicycling opportunities, and family picnics. We request that the analysis and decision-making fully recognize all of these activities and the cumulative negative impact that closing roads and trails has had on all multiple-use recreationists which has become very significant. Additionally, we request that an adequate mitigation plan be included as part of this action to compensate for past cumulative negative impacts.

Issue:

171 Management decisions should be based on input from a management team that is representative of all citizens needs. This is especially necessary to provide a balanced perspective on the travel management team and when consulting and coordinating with other agencies. There is an inherent bias on management teams that do not include OHV enthusiasts. We request that the interdisciplinary team (IDT) include motorized recreation planners and enthusiasts in order to adequately speak for the needs of multiple-use and motorized visitors. A multiple-use and motorized recreationists advisory board could also be used to advise the IDT and decision-makers.

Issue:

172 Presently, very few agency staff members are OHV enthusiasts and can represent OHV recreation interests in day-to-day operations and long-term management decisions. OHV enthusiasts understand how to educate, manage, and meet the needs of OHV recreationists. Agency personnel are not able to relate to the needs and challenges of OHV recreationists because they are not familiar with OHVs nor are they typically OHV recreationists. There is an inherent bias on management teams that do not include OHV enthusiasts. We request that the staff on each project team include an adequate number of OHV enthusiasts in order to adequately represent and address the needs of OHV recreationists. Additionally we request that an adequate number of agency staff be licensed and safety trained to operate OHVs, have an adequate number of OHVs for their use and spend an adequate amount of time riding OHVs along with OHV recreationists so that they can adequately understand the needs associated with motorized access and motorized recreationists.

Responses

O3-165: Discussion of weed infestation in Chapters 2-4 of the RMP/EIS considers all sources of weed infestation, including grazing livestock, OHV use, and vehicular transport.

O3-166: Environmental impacts associated with road obliterations can be highly variable. Factors include degree of obliteration (partial, full), location of the road on the slope (proximity to streams, side slope steepness, slope position, etc.) and the condition of the road itself. Class restrictions are one option we considered and included in some of the alternatives.

O3-167: Comment refers to USFS actions, not BLM actions.

O3-168: Thank you for your suggestion. Volunteers and hosted worker programs are utilized by the BLM.

O3-169: BLM appreciates the efforts of the public to provide trail maintenance. Please see Action RC-D1.7.5.

O3-170: Please see response O3-124.

O3-171: Two members of the Coeur d'Alene District Resource Advisory Committee (RAC) are motorized recreation enthusiasts from the local OHV community. See Chapter 5 for more information about the RAC.

O3-172: Please see response O3-171.

Comments

O3 (Cont.)

Issue:
Natural conditions should be used as the benchmark for the test of impacts on natural resources. All impacts should be measured against a realistic assessment of natural conditions including natural sound levels, sedimentation rates and natural events such as fires, glacial periods, and floods. We request that guidelines be developed to help determine if perceived impacts are significant or insignificant. All measures of perceived impacts should be compared to natural levels of activities over the course of time to test for significance. A significant difference in magnitude should be required before a perceived impact can be considered significant. This standard is required in order to remove personal opinions from the process and to restore impartial and reasonable judgment to
173 the process.

For example, the lack of adequate policy and implementation of fire management practices has lead to many catastrophic fires. The sedimentation resulting from these fires should be measured and compared to all OHV activity in the forest. The results will demonstrate that the rate of sediment resulting from fires is thousands of times greater than that of all OHV activity in the forest. The determination of the natural rate of sedimentation over the course of time will also demonstrate that the natural rate of sedimentation is many times greater than that of all OHV activity in the forest. These are examples of the sense of magnitude and big picture perspective that should be required when evaluating impacts in the document and decision-making.

Issue:
There is no documentation or data to support closure of any motorized routes in the project area to improve wildlife connectivity. The existing level of roads and trails does not significantly impact wildlife connectivity, i.e. it functions as such with the existing level of roads and trails and closing
174 any roads or trails to motorized use would not make any measurable difference. Connectivity is another concept being promoted by extreme green groups such as the Wildlands Project to further their agenda to close all land to the public. Additionally, non-motorized routes would have the same impact on wildlife connectivity as motorized routes and the evaluation must recognize this fact.

Issue:
The Forest Service Stream Systems Technology Center has found, in a paper published in the July 2000 issue of Stream Notes, that roads and trails can easily be hydrologically disconnected from
175 streams. Therefore, the sedimentation concerns can be easily mitigated and should not be used as a reason to justify motorized recreation and access closures except in exceptional cases that cannot be adequately mitigated.

Issue:
A study of sound levels from OHV use was found to be less than the background noise of the wind in treetops (Nora Hamilton, Mendocino National Forest, memorandum to the file, November 17, 1992). Also, the USDA FS Technology and Development Program in a report prepared in 1993 and titled "Sound Levels of Five Motorcycles Traveling Over Forest Trails" found that at distances over
176 400 feet, motorcycles do not raise the ambient sound level (they are no louder than background levels of noise). Absolute quiet is not a reasonable expectation. Sound from motorized sources such as airplanes exists even in the most remote areas. It is not reasonable to expect absolute quiet in areas intended for multiple-use. The sound level of motorized recreation use is not greater than natural sounds, and therefore, sound level should not be used as a reason to justify motorized recreation and access closures.

O3 (Cont.)

Issue:
A study of National Park elk habituated to human activity and not hunted were more sensitive to persons afoot than vehicles (Shultz, R.D. and James A. Bailey "Responses of National Park Elk to
177 Human Activity", Journal of Wildlife Management, v42, 1975). Therefore, hikers disturb elk more than motor vehicles and "disturbance of wildlife" should not be used as a reason to justify motorized recreation and access closures. Additionally, when there are concerns with wildlife disturbance, restrictions on hikers should be given a greater emphasis than restrictions on motorized visitors.

Issue:
Hikers disturb nesting birds (Swarthout, Elliott and Steidl, Robert, Journal of the Society of Conservation Biology, February 2003) yet restrictions on hiking and other non-motorized recreationists to reduce impacts on nesting birds are rarely imposed.

Hiking, cross-country hiking and wilderness uses also causes trail impacts yet these impacts are seldom acknowledged. For example, the USDA FS Intermountain Research Station Research Paper INT-450 "Changes on Trails in the Selway-Bitterroot Wilderness, Montana, 1978-89" and dated 1991 found that many trail segments changed markedly, depending on site and use.

178 Additionally the report "Keeping Visitors on the Right Track - Sign and Barrier Research at Mount Rainer", Park Science 14(4) published in 1994 found that off-trail hiking is a major source of impact that creates trails and erosion throughout the several thousand acres of sub-alpine meadows.

Additionally the report "Erosional Impact of Hikers, Horses, Motorcycles, and Off-Road Bicycles on Mountain Trails in Montana", Mountain Research and Development, Volume 14, No, 1, and published in 1994 found that multiple comparison test results showed that horses and hikers made more sediment available than wheels, and this effect was most pronounced on pre-wetted trails.

Why are there so many double-standards in the impact analyses and decision-making? If the issues surrounding motorized travel are significant enough to justify closures, then, in order to avoid introducing a bias to the evaluation and process the same issues and restrictions should also be applied to hiking, mountain climbing, cross-country hiking, wilderness users, etc.

Issue:
A study of the heart rate of elk found that humans walking between 20 to 300 meters from the elk caused them to flee immediately 41% of the time while an OHV passing within 15 to 400 meters of the elk caused them to flee 8% of the time (Ward, A. L. and J. J. Cupal. 1976. Telemetered heart rate of three elk as affected by activity and human disturbance. USDA Forest Service, Rocky
179 Mountain Forest and Range Experiment Station. Laramie, WY. 9 pp.). Therefore, hikers disturb elk more than motor vehicles and "disturbance of wildlife" should not be used as a reason to justify motorized recreation and access closures. Additionally, when there are concerns with wildlife disturbance, restrictions on hikers should be given a greater emphasis than restrictions on motorized visitors.

Issue:
A study of mule deer found that 80% fled in reaction to encounters with persons afoot while only
180 24% fled due to encounters with snowmobiles (David J. Freddy, Whitcomb M. Bronaugh, Martin C. Fowler, "Responses of Mule Deer to Persons Afoot and Snowmobiles", Wildlife Society Bulletin, 1986). Therefore, hikers disturb deer more than motor vehicles and "disturbance of wildlife" should

Responses

O3-173: Environmental consequences analysis is in compliance with federal regulations and BLM policy.

O3-174: Servheen, Waller, and Sandstrom (2001, Identification and management of linkage zones for grizzly bears between the large blocks of public land in the northern Rocky Mountains, US Fish and Wildlife Service) and the draft EIS for the Northern Rockies Lynx Amendment identified important travel corridors for grizzly bears and Canada lynx. Many of these travel corridors in northern Idaho do not have BLM public lands within them.

O3-175: Such improvements may be made during project-level planning, but are beyond the scope of this document.

O3-176: Noise disturbance is only one of many considerations the BLM incorporates into their decisions regarding any route designations.

O3-177: Elk behavior was monitored in relation to multiple uses in southern Wyoming. Elk preferred a ½ mile buffer from people associated with out-of-vehicle activities (e.g. camping, fishing, harvesting timber, etc.) (Ward, A.L. 1973. Elk behavior in relation to multiple uses on the Medicine Bow National Forest. Proceedings of the Western Association of State Game Commissions 43:125-141).

O3-178: An interdisciplinary team thoroughly analyzed all of the resources and uses on BLM public lands and attempted to address everyone's concerns.

O3-179: Researchers conducted an experiment measuring elk response to ATVs. Elk were less likely to flee away with further distance between them and the ATV. There was up to an 80% response rate when ATVs were 20 meters away, 7-13% times larger than when ATVs were 500 meters away. There were significant responses when an elk was close to an ATV route but the ATV was 2 kilometers away (Preisler, H.K., A.A Ager, and M.J. Wisdom. 2006. Statistical methods for analyzing responses of wildlife to human disturbance. Journal of applied ecology. 43: 164-172). With more than 90,000 off highway vehicles registered in Idaho in 2005, selected drivers of these vehicles harass wildlife and destroy their habitat.

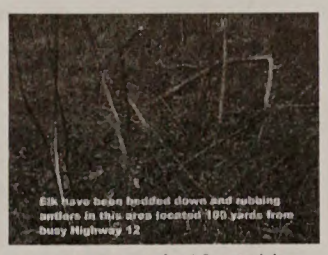
O3-180: Researchers conducted an experiment measuring mule deer response to ATVs. When chased, the deer began to feed at night, used cover more often, moved outside of their home ranges, and produced fewer fawns. The researchers noted that all deer in the study area habituated to the ATV when it was on a predictable route and ignored motor traffic unless they were pursued (Yarmoloy, C., M. Bayer, and V.Geist. 1988. Behavior responses and reproduction of mule deer, *Odocoileus hemionus*, does following experimental harassment with an all-terrain vehicle. Canadian Field-Naturalist, 102(3):425-429). With more than 90,000 off highway vehicles registered in Idaho in 2005, selected drivers of these vehicles harass wildlife and destroy their habitat.

Comments

O3 (Cont.)

180 not be used as a reason to justify motorized recreation and access closures. Additionally, when there are concerns with wildlife disturbance, restrictions on hikers should be given a greater emphasis than restrictions on motorized visitors.

Issue:
The wildlife sections of many travel plan documents tend to promote two underlying themes; (1) wildlife and forest visitors cannot coexist, and (2) there are significant negative impacts to wildlife from visitors to the forest. Observations of wildlife in Yellowstone and Glacier National Parks and the 400 deer that live within the Helena city limits combined with common sense tell us that wildlife can flourish with millions of visitors and motorized vehicles.



181 Wildlife can and do effectively coexist with motorized visitors in even the most heavily visited places. Therefore, concerns with motorized forest visitors and wildlife are often over-stated and over-emphasized which unfortunately demonstrates a predisposition in the process.

The wildlife/visitor interaction in national parks demonstrates that the manner in which visitors coexist with wildlife is the most significant factor in the interaction between wildlife and visitors. The manner in which visitors coexist with wildlife in national forest can be shaped by adequate use of mitigation measures including seasonal closures, educational programs and trail rangers. Therefore, reasonable alternatives to the closure of motorized roads and trails exist and can be used to address wildlife concerns. We request that these sorts of reasonable alternatives to closure of roads and trails to motorized visitors be adequately considered and incorporated into the preferred alternative.

Issue:
"Present day populations of white-tailed deer and elk are at their highest levels recorded in recent history" (Montana Wolf Conservation and Management Planning Document, Montana Fish, Wildlife and Parks, January 2000 (http://www.fwp.state.mt.us/wildthings/wolf/wolfmanagement011602.pdf). Additionally, "nearly 60 percent of Montana's original elk management units exceed elk-population objectives, while only 31 percent exceed harvest objectives" (www.fwp.state.mt.us/hunting/elkplan.html).

182 Additionally, the Northern Continental Divide Ecosystem (NCDE), outside of Glacier National Park, has grizzly bear population densities of about 1 bear per 20-30 square miles and has human recreation consisting of motorized access, motorized recreation, hiking, fishing, camping, horseback riding, and big game hunting. Glacier National Park annually receives approximately 2-3 million visitors, does not allow hunting, and has grizzly bear population densities estimated at about 1 bear per 8 square miles. The Yellowstone Ecosystem (YE) which is comprised of Yellowstone Park and surrounding National Forests, receives more visitation than Glacier Park and has an increasing grizzly bear population estimated at 1 bear per 30-50 square miles (http://www.r6.fws.gov/endspp/grizzly/bittereis/deischp2.htm). All indications are that grizzly bear habitat is fully occupied and that additional road closures and obliteration will not produce any more bears and, therefore, motorized closures are not reasonable or productive. Therefore, grizzly bears

O3 (Cont.)

can coexist at reasonable population densities with multiple-use recreation and there is no compelling reason to close roads and trails to motorized recreationists to increase grizzly populations because the most significant constraint is their need for so many acres between other grizzly bears.

Furthermore, Kate Kendall's Greater Glacier Bear DNA study (includes all the North Fork of Flathead), which identified 367 unique individual bears with one years data not yet analyzed. The recovered population target was 600 bears for the entire Northern Continental Divide Ecosystem, so there is already known that about 2/3 of that target exist on about 1/4 of the habitat. Completion of DNA study of the rest of the ecosystem is certain to show that bear populations far exceed the recovery goal and should be de-listed.

182 Additionally, the number of hunters has leveled off (U.S. Fish and Wildlife Service, 1996 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation. http://library.fws.gov/nat_survey1996.pdf).

Therefore, there are no compelling reasons "to elevate the level of elk security in the project area and…enhance elk populations" as frequently suggested by wildlife biologists (example; Fish, Wildlife and Parks letter dated February 27, 2002 to Helena National Forest on the Clancy-Unionville Travel Planning Project, bottom of page 9). Additionally, there are no compelling reasons to justify reduced road densities as a sought-after or necessary wildlife management criterion. Lastly, there are reasonable alternatives including permit hunting and seasonal travel restrictions that can better accomplish the outcome sought by reduced road and trail densities. NEPA requires consideration and implementation of all reasonable alternatives. Not considering and implementing reasonable alternatives demonstrates a predisposition in the process.

Issue:
A December 31, 2003 Federal Court ruling found that associated with actions taken under the endangered species action must be paid to the public. The case stemmed from the government's efforts to protect endangered winter-run chinook salmon and threatened delta smelt between 1992 and 1994 by withholding billions of gallons from farmers in California's Kern and Tulare counties. Court of Federal Claims Senior Judge John Wiese ruled that the government's halting of water
183 constituted a "taking" or intrusion on the farmers' private property rights. The Fifth Amendment to the Constitution prohibits the government from taking private property without fair payment. "What the court found is that the government is certainly free to protect the fish under the Endangered Species Act, but it must pay for the water that it takes to do so," said Roger J. Marzulla, the attorney representing the water districts that brought the claim. This same standard should also be applied to the economic and motorized recreational losses that the public has suffered under the ESA including motorized closures justified by grizzly bear habitat and impacts on westslope cutthroat trout and bull trout. (http://www.uswaternews.com/archives/arcrights/4caliwate2.html)

Issue:
184 The Agency must support any claim that various recreational activities (e.g., off-highway vehicle use, camping, equestrian use, hunting etc.,) pose significant threats to endangered species. Claims that are highly speculative and based on little or no reliable data should be excluded from the environmental analysis.

Responses

O3-181: Under the preferred alternative, BLM has attempted to exercise as many options to keep trails open to OHV as possible. Roads and trails are generally not closed solely for wildlife concerns, except for temporary events such as elk mating season or eagle nesting periods. If roads or trails are closed, it is generally for a combination of reasons.

O3-182: Northern Idaho does not have either the Northern Continental Divide or the Yellowstone ecosystems, but it does have the Cabinet/Yaak and the Selkirk ecosystems for grizzly bears. The following is taken from the Biological Assessment.

The Cabinet/Yaak represents approximately eight percent of the total occupied grizzly bear range remaining within the conterminous 48 states. Grizzly bear numbers in this ecosystem are estimated at 30 to 40 animals (USFWS 2004e). Until recently, the Service believed that this population was stable to increasing. This belief was based on perceptions of grizzly bear researchers familiar with this ecosystem and population trend analyses. Grizzly bear biologists working in this ecosystem perceived that the population had increased due to more reported grizzly bear sightings and sightings in areas not previously known to be used by grizzly bears in this ecosystem (Kasworm 2000 *in* USFWS 2004e). In 1999 and 2000, an unusually high number of grizzly bear mortalities in this population; there were five grizzly bear mortalities in 1999 and four in 2000, three of which were females and five were cubs. Modeling used by the USFWS to conduct population trend analyses used data from 1993 to 1998 indicated that the grizzly bear population was experiencing annual growth (USFWS 1999). However, the results of the population trend analysis were considered statistically inconclusive (USFWS 2004e).

The Selkirk represents approximately six percent of the total occupied grizzly bear range remaining within the conterminous 48 states (USFWS 2004f). The Selkirk is also one of the smallest recovery zones (1,957 square miles, 1.25 million acres), and only 53 percent (663,814 acres) is contained within the conterminous US; the remaining 47 percent lies within British Columbia, Canada. Forty-six grizzly bears are estimated to be in this ecosystem. Unlike the Cabinet/Yaak population, the Selkirk population is thought to be increasing, although a recent population trend analysis for the Selkirk was also inconclusive. Additionally, recovery plan criteria for bear reproduction, distribution, and mortality have been met only for female grizzly bear mortality (USFWS 2004f). Furthermore, population modeling indicated that one additional subadult female mortality in the sampled Selkirk population could push the trend into a decline (USDI 1999a). In 2002, there were six grizzly bear mortalities, one of which was an adult female (Wakkinen and Johnson 2003).

The BLM does not have the same authority as the Idaho Fish and Game to regulate permit hunting. Action FW-2.1.1 for all alternatives; Action FW-D2.1.2 (see Appendix I, item 21); Action FW-C2.2.6; Action SS-D1.1.5; Action SS-D1.1.7; SS-1.1.8; and Action SS-D1.1.11 identify seasonal restrictions.

(continued on following page)

Responses
(Continued from Previous Page)

O3-183: Section 2(c) of the Endangered Species Act declared the policy of Congress that all Federal departments and agencies shall seek to conserve endangered species and threatened species and shall utilize their authorities in furtherance of the purposes of this Act. Human injury and human caused mortality are the greatest management concerns of grizzly bears. Motorized access enhances the public's access into grizzly bear habitat and, thus, increases the probability of encounters between people and bears. People are often injured and the bear is killed in many of these cases. The BLM uses its authorities to restrict motorized access as a method to reduce human injury, mortalities of bears, and conserve the species.

8.9 miles of roads cross 4,324 acres of BLM public lands within grizzly bear habitat in northern Idaho.

O3-184: Section 2(c) of the Endangered Species Act declared the policy of Congress that all Federal departments and agencies shall seek to conserve endangered species and threatened species and shall utilize their authorities in furtherance of the purposes of this Act.

The BLM and the FWS used the best scientific and commercial data available to determine if any Federally listed or proposed species or designated or proposed critical habitat was present within the action area (50 CFR 402.12(d)).

With the best scientific and commercial data available, the BLM conducted a "hard look" at the impacts of various resource programs towards endangered, threatened, and sensitive species (Sierra Club vs. US Dept of Transportation, 753 F. 2d 120, DC Circuit 1985).

Comments

O3 (Cont.)

184 The Agency must establish much more than a causal connection between recreation activities and any perceived declines in the population of any threatened or endangered species known to reside in the project area. At most, the technical data shows that some recreational activities, in some areas, have the potential to displace some species on a very local level. This, however, cannot establish that recreational activities pose a substantial threat to an entire population or subpopulation of a particular plant or animal.

Suggestions:
a) The agency should not utilize technical data that displays a pronounced bias against public recreation.
b) The agency must not jump to conclusions regarding the effects of recreation on threatened and endangered species.

185 Issue:
Our observations over decades of trail riding have established that significant wildlife mortality does not result from OHV activity. We are not aware of any reports of large animals such as deer, elk, or bear being hit or injured by OHV activity. Additionally, it is extremely rare for OHVs to injure any small animals such as squirrels or chipmunks. We request that wildlife mortality from OHV activity be considered minor and that wildlife mortality not be used as a reason to close roads and trails to OHV visitors.

186 Issue:
OHV use and wildlife can and do coexist. We do not see any evidence in the field that would indicate that summer motorized recreation use is a significant wildlife problem. We support motorized closures where necessary to protect wildlife during the spring calving season and hunting season while maintaining a reasonable level of access during those periods.

187 Issue:
It is obvious from aerial observation of the project area that under the existing conditions so much of the area is inaccessible to motor vehicles and that the existing level of motorized access and motorized recreation is entirely reasonable. Reduced motorized road and trail density is often used as a desired management goal but is not reasonable. The trend of reduced motorized access and motorized recreational opportunities is not necessary and is not consistent with multiple-use management of the area.

188 Issue:
Wildlife management also depends on adequate motorized access. For example, the lack of adequate roads and motorized access for hunter access has led to reduced hunter success and reduced harvest of game animals and affected the overall number and balance of game animals. This in turn has led to the need for cow permits and special hunts. In order to be consistent with the Forest Plan and meet the goal of no net change in herd numbers requires no net change in hunter access which in turn justifies the current level of motorized roads and trails.

189 Issue:
The encroachment of residences into the forest is often the most significant factor contributing to the loss of summer and/or winter wildlife habitat. First, we request that the impact of these permanent encroachments be quantified and compared to the relatively minor impact that mechanized forest visitors have on wildlife habitat. Secondly, public land visitors should not have to

O3 (Cont.)

189 pay the price in the form of motorized closures required to offset the impact of permanent encroachments by private residences. Proper assignment of restrictions would rest on those private individuals who permanently encroached on the natural habitat.

Issue:
Independent scientist should review and participate in all aspects of planning, broad-based assessments, local analysis, and monitoring. Independent scientists must review the published results of all partnership studies including those prepared by students under the direction of professors, in order to be sure that they are appropriately interpreted and documented and that the supporting data is adequte.

190 Scientists may come from within federal or state agencies, or the general public, and may hold a variety of important and influential positions. The study team should:
1) require minimum standards and criteria for qualifications which must be met before a scientist can be deemed an "expert";
2) provide minimum standards and criteria for determining when a scientist may be deemed "independent"; and
3) provide a minimum amount of public notice and opportunity to object whenever any such scientist is considered for such participation, whether such position is permanent or temporary, full time or part time, voluntary or compensated. Such notice should include the qualifications of the individual, the role which the individual will have in such participation, and the type and duration of the position.

Review and participation by independent scientists is a good thing, provided the process require standards which assure that such scientists are in fact qualified and independent, and provide the public the opportunity to review such factors.

191 Issue:
We are greatly concerned about the prevailing management trend for public lands that has significantly reduced or eliminated motorized recreation and access opportunities. Why does the closure of public lands permeate the current management mind set? This mind set is not in line with the best interests of the public. The closure of any existing motorized trail will add to the significant cumulative loss of motorized recreation and access opportunities that has occurred within public lands during the past 35 ± years. In order to avoid contributing further to the significant cumulative loss of motorized recreation and access, we request that the closure of a motorized trail or access should be offset by the creation of a new motorized trail or access of equal value.

192 Issue:
The elimination of public access to public lands through private property has also contributed to the loss of motorized access and motorized recreation opportunities. We request that agencies acquire private land and right-of-ways to provide access to public land that is now blocked off to the public. This action is necessary to reverse the prevailing trend of significantly less public access to public land over the past 35 ± years and the cumulative negative impact of that trend on multiple-use recreationists.

193 Issue:
Private property owners that border public land should not benefit from public land without providing access to the public. Any private landowner that owns land that borders public land and

Responses

O3-185: The Idaho Department of Fish and Game (2003 Big Game Seasons p. 78) learned that (1) elk in roaded habitats are more than twice as likely to be killed by a hunter than those in unroaded areas; (2) selective road closures help reduce the number of bull elk taken and allowed longer hunting seasons; (3) the number of hunters in an area is often directly related to the number of roads; and (4) with more roads (i.e. easy access) and more hunters in an area, more elk are taken, resulting in low bull:calf ratios and fewer mature bulls.

O3-186: Thank you for your comment.

O3-187: Please see response O3-124.

O3-188: The ability to reduce hunter densities and perhaps increase hunter success rates through managing road access appears to be a promising wildlife management tool (Gratson, M.W. and C.L. Whitman. 2000). Road closures and density and success of elk hunters in Idaho. Wildlife Society Bulletin. Vol. 28, no. 2, pp. 302-310).

O3-189: BLM can not control urban growth on non-BLM lands. Loss of habitat is simply the current situation. The alternatives propose a variety of means to enhance habitat to include reducing road density and closing roads where habitat is being adversely affected. Under Alternative D, BLM attempted to balanced this need with that of providing access for recreational use.

O3-190: The BLM interdisciplinary teams is composed of experienced scientists and experts in various fields. The team also used the latest scientific data available in developing the alternatives and when conducting the analysis described in this document.

O3-191: Thank you for your suggestion. Please see response O3-124.

O3-192: The preferred alternative allows for easements to allow access through private lands. Please see Action RC-D1.5.8 in the alternatives section of the RMP. BLM can not discern access based on ownership.

O3-193: Please see response O3-192.

Comments

O3 (Cont.)

193 does not provide puhlic access to that public land should also be denied access to that puhlic land under the principles of fairness and reciprocity. This action is necessary to reverse the prevailing trend of significantly less puhlic access to public land over the past 35 ± years and the cumulative negative impact of that trend on multiple-use recreationists.

Issue:

194 Anytime there is a land exchange between private and public entities, a puhlic access easement or right-of-way should be required in order to offset the trend of less public access to puhlic land over the past 35 ± years and the cumulative negative impact of that trend on multiple-use recreationists.

Issue:

Page 279 of the Supplement to Big Snowy EA. *As previously stated in our response to 3c – Roadless/Wilderness comments, we fail to see how the Roadless Rule has a cumulative effect on multiple-use recreationists. The Roadless Area Canservation Strategy did not prohibit motarized use on roads and trails that already exist within inventoried roadless areas. It also did nat prohibit construction of new motorized trails. It did not designate the areas as wilderness. It did not prohibit the Forest Supervisor from making local decisions about motorized travel within roadless areas. Therefore, we consider this comment beyond the scope af the project.*

We disagree with the conclusion that the Roadless Rule will not have a cumulative negative effect on motorized recreationists. The Final Roadless Rule published on January 5, 2001 included the following directive "The proposed rule did not close any roads or off-highway vehicle (OHV) trails". Even though motorized recreation is allowed by the Roadless Rule, non-motorized groups will contest every inch of motorized trail in roadless areas. The comments suhmitted by non-motorized use groups as part of this proposed action are representative of their position. All too often, the preferred alternative implements a significant reduction in motorized access and recreation. Every action involving travel management in the region has had significant motorized access and recreation closures associated with it. There is no evidence that future actions will be any different.

195

Montana has a total of 16,843,000 acres in National Forests. Of that area, 3,372,000 acres or 20% are designated wildemess. Areas subject to the Roadless Rule total 6,397,000 acres or 38% of our National Forest area. Therefore, 9,769,000 acres or 58% of the National Forest in Montana is either wilderness or subject to the Roadless Rule. This number of acres must be balanced with the fact that wilderness visits account for only 2.55% of the visits to public land (Table 2-7 in the Social Assessment of the Beaverhead-Deerlodge National Forest dated October 2002). Therefore, nearly all (97.45%) visitors to public lands benefit from land management for multiple-use and benefit from motorized access and mechanized recreational opportunities.

Based on our experience with past actions and current proposed actions, motorized recreationists will lose significant recreational opportunities and suffer cumulative negative impacts from the Roadless Rule. Therefore, we disagree that this issue is out of scope. We request that the cumulative negative impact of the Roadless Rule, past actions and future actions be considered a significant issue and adequately considered in the document and decision-making. Additionally, we request that an adequate mitigation plan be included as part of this action to compensate for past cumulative negative impacts.

Issue:

O3 (Cont.)

196 Natural resources are renewable and sustainable when reasonably managed and used. Environmental health is not significantly improved under management for wilderness or roadless character. Reasonable management and use for the benefit of all citizens is best provided under multiple-use policies. We request that decision-making be based on restoring reasonable management and use of public lands.

Issue:

The wilderness designation is not good for recreation and an alternative designation is needed. Many U.S. citizens do not trust our federal land managers to manage our natural resources responsibly. Wilderness advocates have taken advantage of this situation to promote the Wilderness designation and now the Roadless designation as a means to protect these areas. Wildemess designation was originally conceived, by the Wilderness advocates involved in the passage of the 1964 Wilderness Act, as appropriate for about ten million acres of administratively designated Primitive Areas. Present day Wilderness advocates have since expanded the concept to a system of over one hundred million acres and they say we need much more.

An alternative land designation is needed to resolve the Wildemess and Roadless area debate. Off-highway motorcycles, aircraft, snowmobiles, 4X4s, mountain bikes, ATVs, and personal watercraft are not allowed in designated Wilderness areas. Therefore, these popular recreation pastimes are severely impacted by the Wilderness and Roadless designation. Motorized uses that have been grand fathered into some Wilderness areas, such as use of aircraft and powerboats, are subjected to harassment. Horseback riders, hunters and other non-motorized recreationists are also increasingly under attack from Wilderness advocates who push more restrictive regulations in existing Wilderness areas and those areas proposed for that designation.

197

The U.S. Congress should act on legislation establishing a federal designation that is less restrictive to recreational use than Wilderness and the Roadless designation. It should he called "Back Country Recreation Area" (http://www.sharetrails.org/index.cfm?page=39 and http://www.sharetrails.org/index.cfm?page=40). This designation should be designed to protect and, if possible, enhance the backcountry recreation opportunities on these lands while still allowing responsible utilization of these areas by the natural resource industries.

This designation should be used for those areas currently identified by the federal land management agencies as "roadless" and thus currently under consideration for Wilderness designation. Areas considered may or may not be recommended for Wilderness designation or classed as Wilderness Study Areas. In addition, the Forest Service (FS) and Bureau of Land Management (BLM) have administratively developed non-Congressionally designated Wilderness-like reserves or buffer zones. The Forest Service's buffers are called natural and near-natural areas. The BLM's reserves are named primitive and semi-primitive. These non-Congressionally approved land classifications should be receive the Back Country Recreation Area (BCRA) designation.

Many roadless areas have been under consideration for Wilderness designation for over 35 years. The opposition to Wildemess designation in many of these areas has been largely from recreationists whose preferred form of recreation isn't allowed in Wilderness areas. Recreational resources need not be sacrificed for responsible resource extraction. The BCRA designation will encourage cooperation, not only between diverse recreation interests, but also between recreationists and our resource industries.

Responses

O3-194: See Lands and Realty Actions LR-B2.1.6, LR-C2.1.6 and LR-D2.1.6, "Retain necessary public access when lands are transferred out of Federal ownership."

O3-195: Comment pertains to USFS lands, not BLM lands.

O3-196: Please see response O3-3.

O3-197: The issue raised is beyond the scope of the RMP. Please see responses O4-1 and O5-16.

Comments

O3 (Cont.)

197 We request that all "roadless" federal lands, not currently designated as Wilderness, be reviewed for their importance to back country recreationists and designated as Back Country Recreation Areas.

198 Issue:
The Recreation Opportunity Spectrum (ROS) for motorized recreationists should consist of an an equivalent number, type and quality of opportunities as compared to non-motorized recreationists including access to back country recreation areas, long distance back country discovery routes, back country airstrips and destinations including historic areas, lakes, vistas, streams and rivers.

199 Issue:
Many visitors who traditionally use roads and trails in the project area may not participate in a formal NEPA process. The process is both time consuming and confusing to many citizens. Multiple-use interests oftentimes struggle to provide participants due to many other time commitments. At the same time, non-motorized groups funded by foundations have well-organized, trained and experienced staffs that are readily available to participate in the NEPA process and collaborative sessions. These groups are able to participate on a wide front of actions from travel management to timher sales to non-motorized designations. The magnitude of foundation funding available to non-motorized groups tends to amplify their limited-use interests in comparison to the needs of the public. The number of groups and the magnitude of their funding can be found at http://www.green-watch.com/search/directory.asp. For example, there are over 45 special-interest environmental groups operating in our area. This setting often results in non-motorized interests getting undue benefits by creating and manipulating the process. This setting is not based on the principles of addressing public need and technical merit. We request that the effectiveness and impact of foundation-funded organizations versus the needs of all citizens be evaluated and factored into the agencies decision-making.

200 Issue:
Given the current setting (number of actions and time required to address each), most of the public not associated with foundation-funded special-interest environmental organizations does not have the time and money to adequately protect their recreation rights. This characterization typifies most motorized and multiple-use recreationists who already struggle to balance family obligations with work obligations. It is not reasonable to require major involvement in the NEPA process from the working public in order to protect their recreation rights. Conversely, it is not reasonable to reward those groups backed by foundation funding and paid positions with an advantage in the NEPA process and undue recreational opportunities. We request that the cumulative negative impact associated with this setting be adequately evaluated and factored into the decision-making for this action.

201 Issue:
We have also observed from past NEPA travel management processes that the lack of participation by motorized recreationists has been due to the cumulative effect of confusing and poor documentation of the proposals, which included maps that did not have clearly defined characteristics, landmarks, trails, roads, routes and historical sites that would be removed from communal use by the proposed closure action. We are concerned that this lack of understanding will lead to resentment and poor support of motorized closures by the community. We request that the travel management process seek out and document the needs of all motorized visitors including those who traditionally use the primitive roads and trails, plus the handicapped, elderly, and physically impaired as required under 40 CFR 1506.6 *(a) Make diligent efforts to involve the public*

O3 (Cont.)

201 *in preparing and implementing the NEPA process, (3) (vii) Publication in newsletters that may be expected to reach potentially interested persons. (ix) Posting of notice on and off site in the area where the action is to be located, and (d) Solicit appropriate information from the public.* Additionally, NFMA requires the Forest Service *"shall publicize and hold public meetings or comparable processes at locations that foster public participation in the review of such plans and revisions." 16 U.S.C. § 1604(d).*

202 Issue:
Many multiple-use and motorized recreationists have expressed a concern about the general lack of trust in the travel management process. They feel that travel management decisions are pre-determined, that it is pointless to participate in the process, and that travel management is not intended to meet their needs. These opinions could be easily confirmed by publishing a request in local newspapers and on local television channels asking for a response to the question "Do you feel that you have been adequately involved in the closure of roads and trails on public lands to motorized use? Yes or No" and "Do you feel that the needs of multiple-use and motorized recreationists have been adequately considered in the travel management process? Yes or No".

We request that the process adequately meet public involvement requirements with respect to motorized visitors. The process should include methods of public involvement that effectively reach motorized visitors and methods to account for the needs of citizens who may not participate for diverse reasons. Some public involvement methods that would be effective include; (1) the use of trail rangers (who are motorized enthusiasts) to count and interview visitors using the travelways and distribute Travel Management materials to them, (2) publication in the newsletters of motorized association, (3) attendance at motorized club meetings, (4) posting of information packets at motorized trail head areas, and (5) mailings to OHV enthusiasts and owners.

203 Issue:
The number of NEPA actions is overwhelming. For example, each Bureau of Land Management and Forest Service jurisdiction publishes a NEPA Quarterly Report and there are typically at least 30 actions ongoing at any moment. We typically recreate in at least 5 to 6 Forest Service or BLM management areas. The number of NEPA actions at any moment that we would have to evaluate and comment on in order to be involved would total 150 to 180. Refer to Table 2 also. Therefore, the public cannot possibly comment on every road, trail, or document. If this is an over-arching strategy, then it is grossly unfair. It is not reasonable to expect working class citizens to comment on every NEPA action that affects them. Basically, the current planning processes discriminate against the working class because they work at least 40 hours per and cannot dedicate anywhere near enough hours required to keep up with all of the travel planning processes currently on the table.

204 Issue:
We are concerned with the way that comments are being used by agencies in the decision-making process. Agency management has said that the total number of comments received during the process is considered during the decision-making. There is a clear indication that decisions are being made based on those interests producing the most comments. We strongly disagree with a decision-making process using comments as a voting process where the most comments wins the most trails and recreation opportunities because motorized recreationists and working class citizens have a low participation rate in NEPA processes for reasons discussed further in this document.

Responses

O3-198: Please see responses O3-124 and O3-45. Also, based on the number of comments received concerning or relating to recreation settings, Recreation Opportunity Spectrum (ROS) was added to Maps 20-23.

O3-199: All members of the public have equal opportunity to participate in the planning process. The level at which they choose to participate is a matter of personal preference. BLM gave equal consideration to ideas, requests, and other comments from organizations and private citizens throughout this planning process.

O3-200: All members of the public have equal opportunity to participate in the planning process. The level at which they choose to participate is a matter of personal preference. BLM has made great efforts to ensure all members of the public have an opportunity to participate in the planning process. The motorized recreation community was well represented at most of the public meetings that BLM conducted. Also, judging from content of the public comment letters on the Draft RMP/EIS, most were from people who enjoy motorized recreation.

O3-201: The extensive public involvement process that BLM has implemented is described in Chapter 5 of the RMP/EIS. BLM took extra care to prepare easy-to-read travel management maps. During public meetings, BLM received a number of compliments on these maps, and many attendees took copies home with them.

O3-202: Newsletters were sent to anyone who requested one or who signed up to be on the BLM mailing list for this project. See response to O3-201. The newsletters and other information about the planning process were also made available on the project website. During the scoping period, the BLM Project manager participated in a meeting of a local motorized club. Motorized recreationist participation at public meetings and the number of comment letters from them indicate that BLM did an adequate job of informing the public and allowing for their involvement in the planning process.

O3-203: BLM is required to notify the public of all actions that require NEPA analysis. Public citizens are free to choose those actions they wish to be involved with. This is not BLM's overarching strategy.

O3-204: Public comments are used to draw planners' attention to resource issues of most concern to the public. One of the main points of NEPA is to encourage public participation by allowing for comments on most actions. Comments are not counted as votes during the decision making process. Chapter 5 of the Proposed RMP/Final EIS contains a section describing how comments on the Draft RMP/EIS were utilized. The substance of the comments was BLM's main consideration in determining whether or not a change to the Draft was warranted.

Comments

O3 (Cont.)

The intent of National Environmental Policy Act (NEPA) when seeking comments during scoping and document comment processes is to solicit input in order to assure that significant issues were brought forward and considered. This intent is stated in NEPA Section 1501.7 as "*There shall be an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action.*" And in NEPA Section 1503.1 as "*(4) Request comments from the public, affirmatively soliciting comments from those persons or organizations who may be interested or affected.*"

Clearly, comments under NEPA were intended to bring issues and concerns to the attention of the team preparing the environmental document and the decision-makers. NEPA did not suggest that comments were to be used as a voting process to indicate support of alternatives. Nor did NEPA anticipate that the scoping and citizen input would be dominated by well-funded special interest groups. And finally, NEPA did not intend citizens to comment on every possible NEPA as a requirement to protect their interests, needs, and quality of life.

204 Unfortunately, the comment process has been considered a voting process to gauge communal opinion and agencies have not always recognized their responsibility to adequately address the needs of all citizens. This misuse of the comment process has resulted in agencies overlooking the needs of all citizens and decisions have been made that do not adequately address the needs of the public. NEPA requires decision-making that adequately addresses the needs of all members of the public. This direction was stated in Title 1, Sec. 101 of NEPA Policy Act of 1969 as "*achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities...*". Under NEPA, decision-makers have a responsibility to seek out, determine, and make decisions that address the needs of all citizens and not just those that submit comments.

Communal needs are best met by management of public lands and programs for multiple-uses. Motorized roads and trails are a significant source of recreation for all of the public. The public expects decision-makers to adequately protect the existing standards of living and opportunities (human environment) in their decisions. The public expects and needs public agencies to be on their side. NEPA did not intend for citizens who do not comment on NEPA actions to give up their standard of living to those that do. We ask that public comments not be used as a voting process and that the needs of all citizens be fairly addressed in the document and decision-making.

Issue:
The NEPA process is complicated and unapproachable to most of the public yet there has never been a program to inform, educate, and increase the public's awareness and ability to work with the NEPA process. The lack of widespread information, education, awareness and NEPA skills has contributed to extremely low participation in the NEPA process by some sectors of the public.
205 Public participation for even the most controversial proposed action (roadless rule) has involved less than 1% of the affected public. Additionally, the general lack of understanding of the NEPA process has resulted in poor acceptance and opinions of the process by the public.

Moreover, those with significant NEPA knowledge, training, and skills are able to successfully manipulate the NEPA process and have benefited significantly from the process and the ability to influence its decisions.

O3 (Cont.)

205 A quantification of the level of public understanding and participation in the NEPA process has never been undertaken. Additionally, a quantification of the level of public acceptance of the NEPA process has never been undertaken. We request that the significant negative impact on the majority of the public resulting from the lack of information, education, training, understanding and acceptance of the NEPA process be evaluated and that the cumulative negative impacts which have become significant on the public be adequately mitigated.

Issue:
National Foundations are providing significant funding to special-interest environmental groups. For example, Turner Foundation provided $14,174,845 in year 2000 to over 40 organizations that are active in our area (http://www.green-watch.com/search/gmdisplay.asp?Org=581924590).

Pew Foundation provided $37,699,400 in 2001 (http://www.green-watch.com/search/gmdisplay.asp?Org=236234669).

Weeden Foundation provided over $65,000 in 2003 and 2004 (http://www.weedenfdn.org/grantsummaries.htm) with $20,000 going to the Wildlands Center for Preventing Roads with a stated mission of *limiting motorized recreation.*

Another example, Forest Service Employees for Environmental Ethics had a total revenue of $837,550 in year 2000 with $810,853 originating as gifts from 5 foundations (http://www.fseee.org/990/).

206 Financially significant national foundations providing funding to environmental groups in the project area include;
Bullin Foundation (http://www.green-watch.com/search/gmdisplay.asp?Org=916027795),
Banbury Fund (http://www.green-watch.com/search/gmdisplay.asp?Org=136062463),
Edward John Noble Foundation (http://www.green-watch.com/search/gmdisplay.asp?Org=061055586),
Richard King Mellon Foundation (http://www.green-watch.com/search/gmdisplay.asp?Org=251127705),
Charles Engelhard Foundation (http://www.green-watch.com/search/gmdisplay.asp?Org=226063032),
Ford Foundation (http://www.green-watch.com/search/gmdisplay.asp?Org=131684331),
William & Flora Hewlett Foundation (http://www.green-watch.com/search/gmdisplay.asp?Org=941655673),
and W.K. Kellogg (http://www.green-watch.com/search/gmdisplay.asp?Org=381359264).

Cary Hegreberg in the January 2004 edition of the Montana Contractor News described the current situation as "Montana-based environmental groups that specialize in stopping development generate millions of dollars each year selling their "services" to out-of-state donors... Montana certainly doesn't need to produce any more environmental advocacy than our own residents pay for". We are concerned about the magnitude and influence of foundation funding to non-motorized organizations. The level of funding provided to non-motorized organizations from national foundations is tens of thousands of times greater than that available to individuals and local organizations representing multiple-use and motorized recreationists. This level of funding provides non-motorized organizations with significant staffing, management, and legal support. Local residents are closest to the land and should have a major say in the way that the land is managed but they cannot counter the influence of the organized environmental groups.

We request the significant impact that national foundation funding to environmental groups has on motorized recreationists be adequately evaluated and considered including; (1) the impact that

Responses

O3-205: BLM's resource management planning process is focused on public involvement, and NEPA requirements are integrated into this process. BLM has held numerous public meetings, mailed newsletters to hundreds of interested parties, published and updated a website, and been open to work with any interested individuals or groups to involve them in this process. See Chapter 5 for more information about public involvement.

O3-206: Such evaluation is beyond the scope of this document.

Comments

O3 (Cont.)

206 foundation funding has on the NEPA process, (2) the impact that foundation funding has on the decision-making, and (3) the impact that foundation funding has on the NEPA process through significant use of legal challenges to nearly every decision involving multiple-use proposals for public lands. In addition, the document and decision-makers should evaluate the cumulative negative impact national foundation funding has had on all past NEPA actions involving multiple-use and motorized recreation.

Issue:
207 We have been told that motorized recreationists must participate in the travel management process and/or collaborative sessions in order to realize future motorized recreational opportunities. While we agree that motorized recreationists have the opportunity to participate in the NEPA process, the level and effectiveness of participation should not be the deciding factor when making decisions about who gets what recreational opportunities within public lands. NEPA does not identify the quality and quantity of individual and group participation as a decision-making criterion. Agencies should not be overly influenced by the network of influence groups that foundations and environmentalists have established. The network of influence groups has a significant advantage over common citizens in areas including funding, staffing, training and advertising through radio, television, web sites, and newspapers. This setting allows environmental groups to get undue benefits by manipulating the NEPA process. This setting does not address the principles of meeting public need. NEPA and other laws do not intend for independent individuals who are less organized to give up their life's amenities to better-organized and funded groups.

The establishment of recreational opportunities on public lands should be based on public need. Other government entities are directed to address and meet the needs of the public. For example, cities provide water and sewer systems based on public need. Highways are constructed based on public need. The need for these facilities is not based on the level of citizen involvement. The need for these facilities is based on an assessment of need developed by water and sewer usage, traffic counts, etc. The public has a basic expectation that agencies will look out for all of their interests and the best interests of the public are met when agencies respond to the needs of the public in this manner. If members of the public did not comment on the upgrade of a water treatment plant or the construction of a highway does not mean that their water is shut off or that they can't drive to Bozeman. We request that the use of public participation in decision-making for this proposed action be monitored to assure that it is does not obscure the needs of all citizens who rely on the project area for their recreation and livelihoods.

Issue:
208 It has been stated that motorized recreationists should participate in collaborative sessions with non-motorized groups in order to obtain motorized recreational opportunities on public lands. The agencies may think that the definition of a collaborative effort as "working together to develop a solution that reasonably meets the needs of all parties" but the dictionary definition of collaborate is "To cooperate treasonably, as with an enemy".

Additionally, British Prime Ministry Lady Margaret Thatcher describe consensus which is another closely related process as "…the process of abandoning all beliefs, principles, values and policies in search of something in which no one believes, but to which no one objects; the process of avoiding the very issues that have to be solved, merely because you cannot get agreement on the way ahead".

O3 (Cont.)

208 Both sides would be further down the trail towards measurable protection of the human and natural environment if multiple-use, motorized access and motorized recreation were accepted at a reasonable level and we all focused our energy on visitor education, site-specific problems and site-specific mitigation measures. Consensus and collaborative processes cannot by nature produce reasonable results and motorized recreationists should not be forced into these processes where they are guaranteed to lose.

Issue:
209 Multiple-use recreationists are receptive to reasonable actions that benefit both the human and natural environment. The intent and goals of non-motorized groups can be examined by reviewing their comments submitted on this action and other similar proposed actions, reviewing the list of legal actions that they have sponsored, and browsing websites such as: http://www.greatervellowstone.org ; http://wildmontana.org/orvspubland.htm ; http://www.wildlands.org ; http://montana.sierraclub.org ; http://www.sierraclub.org ; http://www.wildmontana.org ; http://www.wildrockies.org/ ; http://www.wildrockies.org/TECI/ ; http://www.wildlandscpr.org ; http://maps.wildrockies.org/orv/ ; http://www.wildrockiesalliance.org ; http://www.friendsofthebitterroot.org ; and http://www.montanawildlife.com (click on "activism" or "issues" or "news" or "take action" or "opinions" or search for "OHV" or "ATV", etc).

A common stated goal of non-motorized groups is the elimination of as much multiple-use on public lands as possible and the establishment of as much wilderness/non-motorized/exclusive-use area as possible (http://www.weedenfdn.org/grantsummaries.htm). While collaborative agreement on a travel management plan between two opposing interests is a desirable solution from an Agency's perspective, the reality of the current setting is that collaborative sessions have failed because a reasonable allocation of recreational opportunities that would meet the needs of all citizens never stays on the table. The approach to travel management taken by the agencies is to pit user groups against each other in the process. Furthermore, the lack of a reasonable multiple-use alternative combined with the significant cumulative negative effects that motorized recreationists have experienced (loss of over 50% of motorized recreational opportunities during the past 35 ± years) precludes motorized recreationists from accepting any additional unbalanced proposals coming out of collaborative sessions. The collaborative approach must produce reasonable multiple-use alternatives for all (100%) of the remaining lands intended for multiple-use.

Additionally, we must make decisions based on adequate consideration of the needs of both the human and natural environment. Recreational opportunities should be established based on the needs of the public and not the negotiating skills of participants in collaborative sessions.

The reality of the current setting is that we must share public lands with all visitors. Sharing requires coexistence among exclusive-use and multiple-use recreationists. It is not reasonable to take the position that motorized and non-motorized recreationists cannot coexist at the levels of use typical in the project area. The motive behind a non-coexisting attitude is a selfish one. Collaborative sessions and decision-makers must not yield to those unwilling to share or accept diversity. All parties must accept diversity and coexist. All parties must be responsive to and willing to meet the needs of the public. The reality of the current setting is that we must make balanced decisions that meet the needs of the public. We have been told that motorized recreationists must participate in the travel management process and/or collaborative sessions in order to realize future motorized recreational opportunities. While we agree that motorized recreationists have the opportunity to participate in the NEPA process, we disagree that the level and effectiveness of participation should

Responses

O3-207: All members of the public have equal opportunity to participate in the planning process. The level at which they choose to participate is a matter of personal preference.

Public comments are simply one facet of the decision-making process. Lack of involvement by a particular group does not mean that their area of interest will not be addressed. However, public attention to a matter ensures that planners consider that area of interest in the process of creating a planning document.

O3-208: Thank you for your comment.

O3-209: Thank you for the information. The four items listed at the end of the comment are reasonable and in fact provide the basis for the creation and selection of the preferred alternative as the proposed action.

Comments

O3 (Cont.)

be the factor deciding when making decisions about who gets what recreational opportunities within our public lands.

209 Decisions should be based on;
(1) accurate and unbiased information,
(2) fairness to all members of the public and their needs,
(3) the principles of sharing and tolerance, and
(4) an equitable distribution of benefits to all interests.

Issue:
210 NEPA does not require or suggest that the quality and quantity of individual and group participation be used as a decision-making criterion. Agencies should not be overly influenced by the network of influence groups that environmentalists have established. The network of influence groups has a significant advantage over common citizens in areas including funding, staffing, training and advertising through radio, television, web sites, and newspapers. Collaborative sessions or other types of negotiations often result in undue benefits for environmental groups because they have manipulated the process. The decision-making process should be solidly founded on the principles of unbiased information and public need.

Issue:
211 Environmental groups have the funding and legal backing to pursue their agenda. Court rulings and negotiations favorable to environmental groups are a heavy influence on the agency decision-making including:

The Bitterroot timber salvage settlement (http://www.helenair.com/rednews/2002/02/08/build/headline/1A2.html) is an example of an unreasonable compromise with environmental groups. The Forest Service developed a reasonable proposal to harvest 44,000 acres (14%) out of 307,000 acres burned during the fires of 2000. The final negotiated settlement will allow just 14,770 acres (5%) to be harvested.

This pattern of unreasonable negotiation was repeated with the Cave Gulch fire settlement (http://www.helenair.com/articles/2003/01/23/helena_top/a01012303_03.txt). Again, the Forest Service developed a reasonable proposal to harvest 2,767 acres (10%) out of a total of 27,660 acres burned during 2000. The final negotiated settlement in January 2003 allowed just 1,191 acres (4%) to be harvested.

This pattern of unreasonable negotiation was repeated with the Snow Talon fire settlement (http://www.helenair.com/articles/2005/12/07/helena/a09120705_01.txt). Again, the Forest Service developed a reasonable proposal to harvest 2,763 acres (7%) out of a total of 37,700 acres burned during 2003. The final negotiated settlement in December 2005 reduced the original proposal by 85% from 27 million board feet of timber to just 4 million board feet to be harvested.

This pattern of unreasonable court rulings was repeated with the Lolo National Forest timber salvage sale proposals after the year 2000 fires. Again, the Forest Service developed a sound proposal to harvest about 4,600 acres or 6% out of 74,000 acres that were burned. Environmental groups challenged that proposal all the way to the Ninth Circuit court and successfully stopped the harvest proposal (http://www.missoulian.com/articles/2005/12/10/news/top/news01.prt).

O3 (Cont.)

Clearly, these and the many other legal actions by environmental groups with funding and resources have influenced the system and set precedent with federal agencies. Appeals and lawsuits by environmental groups greatly outnumber those of average citizens (http://www.fs.fed.us/r1/projects/appeal_index.shtml and http://www.fs.fed.us/emc/applit/index.htm). The current precedent is that legal actions and appeals are the most effective way to influence decisions on how public land is to be managed. Unfortunately, the true public need for management of public lands for multiple-uses is not adequately defended because agencies are so focused on countering the massive legal attack by environmental groups.

211 The final "negotiated" decision-making in these actions had nothing to do with science or public need. The final "negotiated" decision-making in these actions had everything to do with the amount of money and legal support that special interest environmental groups have available. These resources allow them to routinely pursue actions within the NEPA process and significantly influence the NEPA to benefit their special interests. Environmental groups are not representative of the overall public need yet their use of legal actions allowed only their perspective to be represented in a negotiating session. This inequity creates a serious flaw in the process. For example in the Bitterroot and Cave Gulch salvage harvest actions, the "negotiated" settlement conceded too many un-harvested acres (30,000 and 1,600 acres respectively) to wilderness oriented groups, was not based on sound technical information, and was not representative of the majority of public needs. The negotiated settlement will likely happen again with the Snow-Talon Salvage Sale decision (http://www.helenair.com/articles/2005/07/17/opinions/a04071705_03.txt). The same sort of influence and "negotiated" settlement is repeated over and over in travel planning actions and has resulted in the closure of over 50% of the existing motorized roads and trails exceeding 50% in most cases. This "negotiated" decision-making has created a significant negative cumulative negative impact on multiple-use and motorized recreationists.

We request that the use of public participation in decision-making for this proposed action be monitored to assure that it is does not obscure the needs of all citizens who rely on this area for their recreation and livelihoods. Collaborative sessions are inequitable and a travesty if they do not meet a true cross-section of public needs. The needs of the public are best met hy managing public lands for multiple-uses. Multiple-use includes motorized access and motorized recreation. We request that agencies conduct collaborative sessions that produce reasonable multiple-use outcomes.

Issue:
212 Each and every travel management plan has significantly reduced motorized access and motorized recreation. Therefore, non-motorized recreationists gain more opportunities with each and every travel plan compromise that closes motorized roads and trails and areas to motorized recreation. This trend is effectively converting significant areas of multiple-use public land to defacto wilderness/non-motorized/exclusive-use land. This conversion is being repeated over and over and the cumulative negative impact of this trend on motorized access and motorized recreation is significant and must be evaluated as part of this action.

Issue:
213 The lack of money to maintain OHV routes is being used as a reason to close OHV routes and at the same time Recreational Trails Program (RTP) and gas tax money paid by OHV recreationists is not being returned to OHV recreation. There is also unused motorized RTP money available each year. Additionally, the lack of money is used as a reason that new OHV routes cannot be constructed.

Responses

O3-210: Please see response O3-207.

O3-211: Please see response O3-207.

O3-212: Please see responses O3-124, O3-5 and O3-45.

O3-213: Thank you for your comment.

Comments

O3 (Cont.)

213 Solution:
The Forest Service must aggressively pursue and make use of all available forms of OHV trail funding including RTP, and a more equitable return of the gas tax paid by OHV recreationists. As demonstrated in the following comments, the amount of gas tax paid by OHV recreationists is enormous.

Issue:
Our observations of recreationists taking visiting the primitive roads and trails within public lands indicate that 96% of the visitors represented multiple-uses that rely on motorized access and/or mechanized recreation (data available upon request). These needs can be further quantified by researching records from the Motor Vehicle Division (MVD) and the report Fuel Used for Off-Road Recreation (Report ORNL/TM-1999/100, Federal Highway Administration). Both of these sources document OHV numbers by state.

214 Montana is estimated to have 32,747 off-road trucks, 18,400 off-road motorcycles, and 23,017 off-road atvs for a total of 74,164 OHV recreationists (Report ORNL/TM-1999/100). This total does not include other multiple-use visitors using automobiles, SUVs, etc. Nationally, the total estimated off-highway vehicles equal about 7,400,000 which does not include other multiple-use visitors (Report ORNL/TM-1999/100).

Additionally, there are millions of other multiple-use visitors who use motorized access for sightseeing, exploring, picnicking, hiking, rock climbing, skiing, mountain biking, riding horses, camping, hunting, RVs, target shooting, fishing, viewing wildlife, snowmobiling, accessing patented mining claims, and gathering of firewood, rocks, natural foods, etc. Mountain bikers seem to prefer OHV trails because we clear and maintain them and they have a desirable surface for biking. Additionally, many of the routes within the project area are necessary to maintain access to patented mining claims and historic districts. Also, physically challenged visitors must use wheeled vehicles to visit public lands. The needs of all of these multiple-use visitors have not been adequately addressed and the proposed negative impacts to them have not been adequately disclosed. We request that the cumulative needs of these visitors be accurately quantified and the cumulative negative impacts of closures on these visitors be considered in the decision-making.

Issue:
Finding funding for programs can be a challenge. In the case of OHV recreationists, ample funding is being generated by OHV recreationists, however as demonstrated in the following paragraphs, a reasonable amount of this funding is not being returned to OHV recreationists.

215 State governments collect excise taxes on gasoline for road and highway improvements ranging from $0.075 to $0.389 per gallon (References 7, 9, and http://www.flyingj.com/s_tax.html). The federal government collects excise tax on gasoline for road and highway improvements equal to $0.184 per gallon, which is earmarked for the Federal Highway Trust Fund (Reference 8 and 10). A federal excise tax refund program for gasoline used for off-road purposes does not exist at this time. Some states allow purchasers of gasoline for off-road use to collect a state tax refund for fuel used in a non-taxable manner. For example, the State of Montana defines fuel consumed by equipment and vehicles operating off public roads as fuel used in a non-taxable manner (Reference 2). Therefore, excise tax on gasoline used for off-road fuel use should either be refunded to off-highway recreationists or used to fund programs that benefit off-highway recreationists. Neither of these mechanisms are being implemented in an equitable manner at this time. Therefore, a reasonable

O3 (Cont.)

amount of the gasoline excise tax paid by off-highway recreationists is not being returned to off-highway recreationists or used for their benefit at this time.

The magnitude of gas tax paid by OHV recreationists is significant. Fuel used for off-road motorcycle, atv and 4-wheel drive recreation in Montana is estimated at 18,537,060 gallons per year (Reference 1). The State of Montana fuel tax is $0.2775 per gallon (Reference 2). Therefore, an estimated $5,144,034 in state fuel tax ($0.2775 per gallon times 18,537,060 gallons per year) is paid annually by Montana off-road recreationists. The present worth of this annual amount over the past 30 years is about $88,940,000. Other states can be calculated by referring to the state gas tax amount per gallon published at http://www.flyingj.com/s_tax.html . Unfortunately, most of the state tax paid by OHV recreationists on gasoline ends up being used for other programs and not for OHV programs.

Additionally, federal gas tax paid by OHV recreationists living in Montana is significant and is estimated at $3,410,819 ($0.184 per gallon times 18,537,060 gallons per year). The present worth of this annual amount over the past 30 years is about $58,973,000. There is no method for direct return of the federal excise tax to OHV recreationists. Therefore, most of the federal excise tax paid by OHV recreationists on gasoline ends up being used for other programs and not for OHV programs. In summary, OHV recreationists in Montana generate total state and federal annual gas tax revenue on the order of $8 million and a present worth over the past 30 years of about $150,000,000. Other states are similar or more. This level of funding would be sufficient to fund expanded and enhanced OHV programs in Montana and other states but this objective requires an equitable means of

215 returning off-road gas tax to OHV recreationists.

The amount of gas tax being returned to Montana OHV recreationists through State Trails Program (STP) and Recreational Trails Programs (RTP) is on the order $200,000 per year (References 3 and 4) or about 3% of the actual state and federal gas tax paid by OHV recreationists. This small percentage of return is not equitable and other states also follow this trend. We request that revisions be made to state and federal programs in order to return to OHV recreationists the full amount of gas tax paid by OHV recreationists in the form of funding specifically earmarked for enhanced and expanded OHV Programs.

Furthermore, at the national level, RTP was funded at a $50,000,000 level in fiscal year 2002 (Reference 5). The maximum amount made available to OHV projects by RTP funds is no more than 70% (split of funds is authorized at 30% motorized recreation, 30% for non-motorized, and 40% for diverse trail use, Reference 6). If an estimated 50% (probably high given current circumstances) were returned to OHV recreationists through the RTP program, then the total amount returned to OHV recreationists at the national level would be about $25,000,000.

Table 7.1 in Reference 1 reports the total annual gallons of gasoline used nationally by all off-road recreationists is about 1,882,191,331 gallons. Most states limit a refund of excise tax on gasoline to off-road use to agricultural or commercial off-road use and specifically do not allow a gas tax refund to OHV recreationists. Therefore, about $470,547,832 (assuming a minimum state and federal gas tax rate of $0.25 per gallon times 1,882,191,331 gallons per year) is paid in fuel taxes by all off-road recreationists in the country each year. The present worth of this annual amount over the past 30 years is about $8,135,772,000. At a national level, the amount returned to OHV recreationists by the RTP program is no more than 5% of the actual state and federal gas tax paid by OHV recreationists. This small percentage of return is not equitable. We request that revisions be made to state and

Responses

O3-214: Please see responses O3-124 and O3-45.

O3-215: Grant programs funded by gas taxes and/or vehicle registration fees are administered by Idaho Department of Parks and Recreation, Idaho Transportation Department and the Federal Highway Administration. BLM field offices routinely apply for and compete for grant funds.

Comments

O3 (Cont.)

federal programs in order to return the full amount of the gas tax paid by OHV recreationists to programs that benefit OHV recreationists.

OHV recreationists have significant needs that have gone unmet for many years due to the lack of adequate funding. The lack of adequate funding and attention to these needs has also contributed to some concerns associated with OHV recreation. An adequate level of funding, as discussed above, would address all needs and concerns associated with OHV recreation including environmental protection and mitigation projects, education and safety programs, the enhancement of existing recreation opportunities and, the development of new OHV recreation opportunities necessary to meet the needs of the public. We request the development of a funding mechanism that equitably returns gas tax revenues directly to OHV recreationists.

Additional funding is needed for expanded and enhanced OHV programs to effectively address the concerns and needs of OHV recreationists including programs:

- To provide greater promotion of responsible OHV recreation,
- To provide greater promotion of OHV tourism,
- To provide greater promotion of an OHV Safety program and distribution of safety educational materials,
- To provide greater promotion and distribution of educational materials on land use and visitor ethics,
- To provide greater promotion and distribution of educational materials on OHV and hunting ethics,
- To actively promote and support the development of local OHV organizations in all areas of the state to further promote OHV educational and awareness programs,
- To promote greater registration of OHVs which will produce greater support for the OHV Program,
- To develop and distribute a monthly or quarterly newsletter to all registered OHV owners,
- To develop and distribute OHV information including maps and listings of OHV recreational opportunities,
- To develop multiple-use recreation opportunities on public lands as allowed under existing laws,
- To develop and operate a collection and distribution point for OHV recreational and educational information, links to OHV clubs, etc.,
- To provide a Trail Ranger program that supports OHV recreationists similar to the State of Idaho's,
- To mitigate all existing concerns with OHV recreation on public lands in cooperation with federal and state agencies and in conformance with all existing laws and a Memorandum of Understanding dated February 25, 2002 between U.S. Department of Agriculture, Forest Service and the Blue Ribbon Coalition, and
- To develop and promote all reasonable OHV recreation opportunities on public lands in cooperation with federal and state agencies and in conformance with all existing laws and a Memorandum of Understanding dated February 25, 2002 between U.S. Department of Agriculture, Forest Service and the Blue Ribbon Coalition.

215

Note that an OHV Trust Fund should be set up to collect and hold OHV gas tax monies paid by OHV recreationists in the past but not returned to them. This trust fund could also be used in the

O3 (Cont.)

event of delays in the start-up of OHV Programs and to accommodate the scheduling of NEPA actions for on-the-ground OHV projects.

In summary, we cite a common principle of law articulated in the Montana Codes Annotated "1-3-212. Benefit -- burden. He who takes the benefit must bear the burden." We agree with that principle and the necessary obverse, "He who bears the burden must receive the benefit." We request that all gas tax revenue generated by OHV recreationists be returned to OHV recreationists for their benefit and used to address; through education, mitigation, enhancement, and development projects; all of the concerns and needs associated with OHV recreation.

215

Reference 1: Report ORNL/TM-1999/100, Federal Highway Administration http://www-cta.ornl.gov/cta/Publications/pdf/ORNL_TM_1999_100.pdf
Reference 2: http://www.mdt.state.mt.us/administration/gastaxrefund.html
Reference 3: http://www.fwp.state.mt.us/parks/trails/trailgrantapps.asp
Reference 4: http://www.fwp.state.mt.us/parks/ohvgrantaward.asp
Reference 5: http://www.fhwa.dot.gov/environment/recfunds.htm
Reference 6: http://www.fhwa.dot.gov/environment/rtbroch.htm
Reference 7: http://www.wsdot.wa.gov/KeyFacts/GasTaxRates.htm
Reference 8: http://www.wsdot.wa.gov/KeyFacts/HiwayUserFees.htm
Reference 9: http://www.njpp.org/archives/otr_gastax.html
Reference 10: http://www.bts.gov/transtu/ts2/ts2.htm

Issue:
Past comments made in opposition to the Symms Act by non-motorized groups have tried to establish that the OHV portion of the Symms Act and RTP are subsidized by public funds, however, just the opposite is true. Off-road motorized recreationists do have a funding mechanism available in the form of the gas tax monies collected from their gas purchases and, furthermore, these monies may have been inappropriately used for non-motorized projects. Additionally, wilderness trails are routing maintained without a source of funding tied to the users. In contrast to that situation motorized trails are seldom maintained by the agency even though motorized recreationists generate more than adequate funding through the collection of gas taxes. We request that corrective actions (an adequate mitigation plan) be taken to address to return all past and current off-road gas tax monies to OHV recreationists.

216

Issue:
The lack of funding is often used as an excuse to avoid addressing problems associated with OHV recreation when in reality there is more than adequate funding. This is another example of the absence of a rational connection between the facts found and the choice made. Furthermore, the diversion of gas tax paid by OHV recreationists to other programs has contributed to many of the problems facing motorized recreationists. We request the evaluation of the impact and cumulative negative impacts that have resulted from the diversion of gas tax paid by OHV recreationists to other programs including impacts associated with reduced OHV safety, education, mitigation, and development programs. Additionally, we request that an adequate mitigation plan be included as part of this action to compensate for past cumulative negative impacts.

217

Issue:
We have noticed that most trails in wilderness areas are adequately maintained with clearing, water bar construction and trail rerouting provided on an annual basis. All of this is done by agencies

218

Responses

O3-216: Such action would take place at the federal level, and is beyond the scope of this RMP.

O3-217: Please see responses O3-215 and O3-216.

O3-218: Please see responses O3-215 and O3-216.

Comments

O3 (Cont.)

218 without any user-generated fees. At the same time motorized resources see very little maintenance and motorized recreationists have had to do a lot of work themselves in order to keep motorized routes open even though OHV gas tax has generated over 8 hillion dollars over the last 30 years. Moreover, to top off this incredihly inequitahle situation, lack of maintenance is often used as a reason to close motorized recreational resources. We request that this issue he addressed and corrected by using OHV generated gas tax monies for maintenance, education, and construction of motorized recreational opportunities.

219 Issue:
There are cases where OHV gas tax funding has been used to improve a non-motorized trail. There are also cases where OHV gas tax money has heen used to improve a trail and then that trail has been closed to motorized use. The use of OHV gas tax funding for non-motorized recreation is improper. We request that these cases he identified and that they be corrected by replacing motorized recreational opportunities that have heen closed with new motorized recreational opportunities of equal recreational value.

220 Issue:
Any significant closing of motorized routes in the project area does not meet the basic requirement of the NEPA act of 1969 as stated in "Sec. 101 (b) (5) *achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities".* High standards of living and a wide sharing of life's amenities should include recognizing and meeting the need for motorized access and recreation opportunities in the project area. All visitors should be expected to share the project area with others and to tolerate the presence of others. We have met very few hikers on the multiple-use roads and trails that we use. We have not perceived any problems with the non-motorized visitors that we have met. We ask that the analysis and decision-making be hased on sharing and tolerance and to avoid unreasonahle accommodation of visitors to public lands that are not reasonably tolerant and sharing.

221 Issue:
The first sentence on the inside cover of most federal environmental documents includes a statement similar to "*The United States Department of Agriculture (USDA) is a diverse organization committed to equal opportunity in employment and program delivery."* We are greatly concerned about the lack of equal recreation opportunity and quality within public lands. Everyone should have equal access and opportunity to enjoy the natural environment. There is a need for motorized recreation and access opportunities (areas and trails including inter-forest and interstate routes, OHV back country discovery routes, and OHV byways) equal to our non-motorized/wilderness opportunities (examples include the Lewis and Clark and Nez Perce National Historic Trail, Pacific Crest Trail, Continental Divide Trail, Pacific Crest Trail and National Recreation Trails). We request actions that will develop regional (inter-forest and interstate connections) motorized recreational opportunities such as the proposed Great Western Trail and Oregon Back Country Discovery Route. OHV back country discovery routes and OHV byways are required to provide opportunities for motorized recreationists equal to existing long-distance non-motorized opportunities.

222 Issue:
Our vision for motorized recreation includes opportunities such as the proposed Great Western Trail and Oregon Back Country Discovery Route, and other regional opportunities that include connections between forests and adjoining states. A system of OHV back country discovery routes

O3 (Cont.)

222 and OHV byways could provide loops and interconnecting trails to points of interest including lakes, streams, rivers, ghosts towns, and scenic overlooks. This system of OHV routes could also include connections to small towns for access to motels and restaurants and could be a significant source of economic revitalization for the project area. OHV recreation and tourism could be a significant boost to many local economies. This potential has yet to be recognized and tapped. Examples of OHV tourism can be found at: http://www.visitid.org/Outdoor/ATV.html , http://www.marysvale.org/ , http://www.trailscout.com/ , http://www.transamtrail.com/main.htm , http://www.motorcycleexplorer.com/ , and http://www.visitnorthidaho.com/wallace.html . We request that the positive benefits of OHV recreation and tourism be considered as part of the evaluation and implemented for this action.

223 Issue:
OHV recreation and tourism has not heen promoted or supported by Montana Department of Fish, Wildlife and Parks (MDFWP) as aggressively as recreation and tourism associated with fish and wildlife programs. Be clear that this is not a reflection on the dedicated OHV staff assigned to the MDFWP OHV program; rather it is a function of perceived conflicts of interest and lack of management directives that exists within MDFWP. These conditions significantly restrict what OHV staff members and the MDFWP OHV program can accomplish. For example, the mission, vision, and goals statement for MDFWP do not mention the OHV program. MDFWP is focused and managed as a fish and wildlife management agency. We request that MDFWP actively promote OHV recreation and OHV tourism. We also request that MDFWP increase the level of OHV management to a level that addresses the needs of motorized recreationists, enthusiastically promote OHV recreation opportunities and enthusiastically develop OHV tourism.

224 Issue:
Inadequate attention and passive support of OHV recreation by agencies in a position to support and manage OHV recreation has contributed to the issues impacting OHV recreationists. Again, motorized access and motorized recreation including OHV recreation are the most popular, fastest growing and most fundable forms of recreation and should be given a much higher priority. We request that the cumulative negative impact on OHV recreation resulting from less than adequate and enthusiastic support from managing agencies be adequately evaluated in the document and adequately considered during the decision-making. Additionally, we request that an adequate mitigation plan be included as part of this action to compensate for past cumulative negative impacts.

225 Issue:
Many handicapped, elderly, or physically impaired citizens can only access and recreate on public lands by using motorized roads and trails. The needs of these citizens should be adequately considered. On November 10th, 1998, President Clinton signed Public Law 105-359, requiring the Secretary of Agriculture and the Secretary of the Interior to conduct a study to improve access for persons with disabilities to outdoor recreation opportunities made available to the public. This law states:

(a) STUDY REQUIRED. – The Secretary of Agriculture and the Secretary of the Interior shall jointly conduct a study regarding ways to improve the access for persons with disabilities to outdoor recreational opportunities (such as fishing, hunting, trapping, wildlife viewing, hiking, hoating and camping) made available to the puhlic on the Federal lands described in suhsection (h).

Responses

O3-219: Thank you for your comment.

O3-220: Please see response O3-3.

O3-221: Please see response O3-2.

O3-222: Due to the small, scattered land base managed by the BLM in the planning area, the agency does not have the capability to initiate the establishment of extensive long distance OHV trails. Refer to Map 1. Action RC-D1.5.6 does propose planning to design an interconnected road and trail network in the Rochat Divide/Pine Creek Special Recreation Management Area.

O3-223: Comment pertains to conditions in Montana, which is outside of the planning area.

O3-224: Please see responses O3-124 and O3-45.

O3-225: In meeting the agency goal of improving access to appropriate recreation opportunities, the BLM complies with provisions of the Architectural Barriers Act (ABA) of 1968 and Title 5 - Rehabilitation Act of 1973. While the Americans With Disabilities Act (ADA) does not apply to federal agencies, BLM voluntarily complies with its provisions in instances where it is more stringent than the ABA. The ADA-ABA Guidelines are adopted standards for the design and construction of built features in the outdoor environment.

Comments

O3 (Cont.)

(b) COVERED FEDERAL LANDS. – The Federal lands referred to in subsection (a) are the following:
(1) National Forest System lands.
(2) Units of the National Park System.
(3) Areas in the National Wildlife Refuge System.
(4) Lands administered by the Bureau of Land Management

The Study prepared to address P.L. 105-359 (Improving Access to Outdoor Recreational Activities on Federal Land, prepared by Wilderness Inquiry, June 27, 2000) found and recommended the following areas of action:

225 *1) Agencies must re-dedicate their efforts to achieve the goal of equal opportunities for access to outdoor recreation by persons with disabilities.*
2) Agencies should conduct baseline assessments of existing facility and programmatic accessibility, and develop and implement transition plans for facilities and programs that are not now accessible to bring them into compliance.
3) Increase accessibility related awareness and educational oppartunities for agency personnel, service praviders, and partners.
4) Increase funding to federal land management agencies for accessibility.
5) Increase accountability and oversight in implementing accessibility initiatives.
6) Improve communications about opportunities far outdaor recreation to persons with disabilities.
7) Clarify the balance between resaurce protection and accessibility.

We request that the proposed action adequately address and comply with the recommendations of the Study conducted to address P.L. 105-359 including items 1 and 7.

Issue:
Issue:
226 Equal treatment and access to public lands must be provided for all people including motorized visitors. One example of unequal treatment is demonstrated by the agency sponsored hikes. We have never seen an agency sponsored OHV outing. Another example is the number of agency publications and information on agency web sites promoting non-motorized recreation versus the publications and web site information pages provided for motorized recreationists. Non-motorized recreation opportunities are easy to find using agency web sites and printed information. Most often little or no information is provided about motorized recreation opportunities. The one good example of a motorized web site can be found at http://www.fs.fed.us/r6/centraloregon/recreation/cohvops. There is a need for every forest and district to have a similar motorized recreation web site. Another example of bias is the fact that signs say "Non-motorized Uses Welcome" and we have never seen a sign that says "Motorized Uses Welcome".

Issue:
227 Motorized visitors are extremely concerned over the significant cumulative loss of many historic travelways. Motorized visitors are unwilling to compromise any further because of the cumulative loss of motorized access and recreation opportunities that has resulted in the lack of equivalent recreation and access opportunities within public lands. Motorized visitors have the need for trail systems and areas equal to those available to non-motorized visitors (areas and trails including inter-forest, interstate routes, Continental Divide Trail, Pacific Crest Trail and National Recreation

O3 (Cont.)

227 Trails). There are no new opportunities within public lands to make-up for the closure of roads and motorized trails. Therefore, a substantial need for motorized recreation and access opportunities will not be met if a substantial number of roads and trails are closed. We request that the impacts associated with the significant loss of motorized recreation and access opportunities be adequately addressed in the environmental document and decision-making, i.e. Where will displaced motorized visitors go? And, due to the lack of any reasonable motorized access and recreation opportunities, what will they do? Additionally, we request that an adequate mitigation plan be included as part of this action to compensate for past cumulative negative impacts.

Issue:
228 We request that the loss of motorized recreation and access opportunities due to millions of acreas of area closure (motorized travel restricted to designated routes) be adequately addressed in the document and decision-making. The area closure action without closing of any existing roads and trails is a significant loss of recreation and access opportunities to motorized visitors. The lack of adequate consideration of the negative impact of area closure on access and motorized recreation has produced a cumulative negative impact that is significant. We request adequate consideration of area closure impacts on motorized visitors in the project area and the cumulative negative impact of all area closures. Additionally, we request that an adequate mitigation plan be included as part of this action to compensate for past cumulative negative impacts.

Issue:
229 Past actions have closed many roads and trails to motorized recreation and access without addressing the merits of each one. We are concerned with the lack of site specific analysis for past road and trail closures. Justification has included reasons such as non-system roads or trails, ghost roads, user created roads etc. that are not site specific and do not provide adequate justification. The fact is that many roads and trails in use today have been created by visitors going back to the early days of history when all public lands were "open" to motorized access. Agencies cannot select which roads are useful to keep and which are not without a site-specific analysis. The cumulative negative effect of not analyzing each road and trail segment is tremendous. We request that the decision-making be based on the individual and site-specific merits of each travelway. Additionally, we request that an adequate mitigation plan be included as part of this action to compensate for past cumulative negative impacts.

Issue:
230 Non-system roads and trails are a significant OHV recreation resource. However, non-system roads and trails are, most often, not inventoried and considered in the travel management process. Failing to identify and consider non-system roads and trails in the travel management process will under-estimate the existing use and needs of motorized recreationists. Therefore, the impact that the resulting closure of non-system roads and trails by non-consideration will have on motorized recreationists will also be under-estimated. NEPA requires adequate disclosure of all impacts and this is not happening with respect to all existing non-system roads and trails that are in use by the public. We request that adequate consideration be given to a comprehensive inventory and analysis of all non-system roads and trails and the current recreational opportunity that they provide to motorized recreationists.

Issue:
231 All public lands were largely open to motorized access prior to the 1960's. Many existing roads and trails were created by legal logging, mining and public access during this period. Nearly all of the

Responses

O3-226: Thank you for your comment.

O3-227: Please see responses O3-124, O3-5 and O3-45.

O3-228: Please see responses O3-124, O3-5 and O3-45.

O3-229: Please see responses O3-124, O3-5 and O3-45.

O3-230: Please see responses O3-124, O3-5, O3-17 and O3-45.

O3-231: The 3-state OHV plan does not apply to Idaho.

Comments

O3 (Cont.)

231 roads and trails in the project area have been in existence for many years with many dating back to the turn of the century. The term "unclassified road or ghost road" may give the impression that these roads evolved illegally. We request a clarification in the document that travelways with these origins are legal travelways as recognized by the 3-States OHV ROD. We are very concerned that the agencies are not honoring this agreement and decision. Additionally, we request that these roads and trails continue to provide recreation opportunities for motorized visitors and that mitigation measures be used, as required, to stabilize or address any environmental concerns.

232 Issue:
We are concerned about the loss of access and impact on the handicapped, elderly, and physically impaired produced by each motorized closure to historic sites and traditional use areas. The proposed closures deny these citizens access to public lands that are especially important to them. We request that all the roads, trails, and features of interest be analyzed for the access and recreation opportunity that they provide for handicapped, elderly, and physically impaired visitors.

233 Issue:
The concept of area closure is not consistent with Forest Service regulations as established by appeals to the Stanislaus National Forest Travel Management Plan (http://www.fs.fed.us/r5/ecoplan/appeals/1998/fy98_stanislaus.htm). We request that the findings of that appeal including the following excerpts be included in this evaluation:

1) *Pursuant to regulations and policy, the Forest Service shall "Designate all National Forest System lands for off-road vehicle use in one of three categories: open, restricted, or closed" (FSM 2355.03-3). Restricted is defined as "Areas and trails on which motorized vehicle use is restricted by times or season of use, types of vehicles, vehicle equipment, designated areas or trails, or types of activity specified in orders issued under the authority of 36 CFR 261" (FSM 2355.13-2).*
2) *The Forest Supervisor decided to manage motorized use as closed unless designated (signed or mapped) as open (DN, p. 3). This affects over 2,500 miles of Level 2 roads and trails on the Stanislaus. His decision is inconsistent with Federal regulations, which require signage for closed routes, not open ones.*
3) *I found the Forest Supervisar's decision on signing inconsistent with Federal regulations, which require signage far closed routes, nat apen ones. The Forest Supervisor is directed to managed motor vehicle travel as restricted to designated rautes unless signed or physically closed. Vehicle restrictions must be processed in accordance with 36 CFR 261.50 and posted in accordance with 36 CFR 261.51. 36 CFR 295.4 addresses additional requirements for public infarmation regarding Use af Motor Vehicles Off Forest Develapment Raads. Restrictions on motor vehicle travel will be addressed through site specific NEPA analysis with cansideration af any civil rights impacts.*
4) *Where RS 2477 rights are asserted, these routes may be considered for motor vehicle use.*
5) *Raute maps were not included in the planning documents and the quad maps af the Opportunity Classes were difficult to read due ta their scale.*

234 Issue:
The signing of "closed unless posted open" is not consistent with the 3-States OHV ROD and is confusing to the public. The 3-States OHV decision logically defines what constitutes an open road or trail and the appropriate vehicle for that route. This is a more reasonable approach than "closed

O3 (Cont.)

234 unless posted open".

235 Issue:
Closed unless posted open is an impractical concept because signs do not last very long for many reasons including vandalism, animals and weather knocking them down, rotting of posts, etc. It is not fair to the public and will be very confusing to have somebody pull down a sign and then it is technically illegal for the public to travel on that route. Signs will become damaged and/or destroyed and then the public does not know whether they are legally open or closed. Additionally, "closed unless posted open" will have a huge annual maintenance cost that will be difficult to fund. Also, posting signs as required to adequately define open routes under "closed unless posted open" will be extremely unsightly which should not be considered reasonable or acceptable.

236 Issue:
A science-based approach to the analysis of forest roads is presented in the Forest Service publication FS-643 Roads Analysis which was published in August 1999. This document includes a comprehensive overview of considerations and issues, suggested informational needs and sources, and analytical tools that should be evaluated during the analysis of forest roads. Many of the considerations and issues presented in FS-643, if evaluated adequately and fairly, would support keeping primitive roads and trails in the project area open for motorized recreation, handicapped, elderly, and physically impaired. We request that FS-643 be used in this evaluation to determine the specific values of each motorized road and trail.

Some of the considerations and issues are:

Economic (EC)
EC (1) How does the road system affect the agency's direct costs and revenues?
EC (2) How does the road system affect priced and non-priced consequences included in economic efficiency analysis used to assess net benefits to society?
EC (3) How does the road system affect the distribution of benefits and costs among affected people?
Timber Management (TM)
TM (2) How daes the road system affect managing the suitable timber hase and other lands?
Minerals Management (MM)
MM (1) How does the road system affect access locatahle, leasable and saleable minerals?
Special Use Permits (SU)
SU (1) How does the road system affect managing special user permit sites?
Protection (PT)
PT (1) How does the road system affect fuels management?
PT (2) How does the road system affect the capacity of the FS and cooperators to suppress wildfires?
PT (3) How does the road system affect risk to firefighters and public safety?
Road Related Recreation (RR)
RR (1) Is there now or will there be in the future excess supply or excess demand for roaded recreation opportunities?
RR (2) Is developing new roads into unroaded areas, decommissioning existing roads, or changing maintenance of existing roads, causing significant changes in the quantity, quality,

Responses

O3-232: Please see response O3-225.

O3-233: Comment pertains to USFS, not BLM.

O3-234: The 3-state OHV plan does not apply to Idaho.

O3-235: The Record of Decision and Approved RMP will contain maps identifying open routes and restrictions. Posting of signs is an implementation action that is beyond the scope of the RMP.

O3-236: Although this publication applies to the USFS, not BLM; all of the listed items were generally considered in the analysis of the alternatives for the RMP.

Comments

O3 (Cont.)

or type of roaded recreation opportunities?
RR (3) Who participates in rooded recreation in the areas affected by road constructing, maintaining, or decommissioning?
RR (4) What are these participants' ottachments to the area, how strong are their feelings, and are there olternative opportunities ond locotions availoble?
Social Issues (SI)
SI (1) What are peoples' perceived needs and values for roads? How does road management affect people's dependence on, need for, ond desire for access?
SI (2) What are people's perceived needs ond values for access? How does road manogement affect people's dependence on, need for, and desire for access?
236 *SI (3) How does the rood system offect access to historical sites?*
SI (4) How are roads that are historic sites affected by road management?
SI (5) How is community social and economic health affected by road management?
Civil Rights and Environmental Justice (CR)
CR (1) How does the road system, or its monagement, affect certoin groups of people (minority, ethnic, cultural, rocial, disabled, and low-income groups)?

We request full use of the FS-643 Roads Analysis Manual in order to adequately account for the social, economic, cultural, and traditional values that motorized roads and trails provide to the public. FS-643 should be used on every road and trail segment in order to adequately identify and evaluate the needs of motorized visitors and in order to avoid contributing to additional cumulative negative impacts to motorized visitors.

Issue:
237 The environmental document should be an issue driven document as required under NEPA and the Council on Environmental Quality guidelines. The driving issue is the development of a reasonable travel management alternative that addresses the needs of the public. NEPA requires that agencies "Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated" [40 CFR 1502.14(a)]. We request that the environmental document adequately addresses the social, economic, and environmental justice issues associated with multiple-use access and motorized recreation. We request that the environmental document include a travel management alternative for the project area that adequately responds to these issues and the needs for multiple-use access and recreation.

Issue:
238 The underlying strategy of past travel management actions has been to eliminate as many motorized recreational opportunities as possible and to avoid the creation of any new motorized opportunities. We request that the underlying principle of all new travel management actions be to maintain the existing level of opportunities for motorized visitors. We also request that the document and decision-making; (1) evaluate the cumulative negative effect of past strategies to eliminate motorized recreation opportunities including the conversion of multiple-use lands to all designations of non-motorized areas including pre-Columbian scheme, monuments, wilderness, wilderness study areas, roadless areas; and (2) enact actions that will offset the cumulative negative effect of past strategies to eliminate motorized recreational opportunities.

Issue:

O3 (Cont.)

239 A new strategy for travel management actions should be to enhance the level of opportunities for motorized visitors in order to be responsive to the needs of the public. Enhancement could include roads and trails systems with loops, exploration destinations such as lakes, mines, scenic overlooks, and inter-connections to other public lands and regional trails. We request that the preferred alternative include the enhancement of motorized recreational opportunities.

Issue:
240 We request evaluation of the loss of opportunities for off-highway vehicles due to the lack of a continuous system of roads and trails on which off-highway vehicles can be legally ridden and the formulation of a preferred alternative to address that issue. In areas where OHVs must use a roadway, we request that a reasonable travel management alternative be developed that includes the designation of a reasonable network of dual-use roads to allow inter-connection access to OHV recreational resources.

Issue:
241 The preferred travel management alternative should maintain existing travelways that provide motorized access to recreational loops and destinations. We also request that the preferred alternative avoid cutting off access to motorized looped trail systems, exploration opportunities, destinations, and motorized access areas located outside the project area. The cumulative negative effect and lack of motorized access to loop trail systems and destinations outside of the project area should be adequately addressed in the analysis and decision-making.

Issue:
242 A reasonable travel management alternative is needed in order to avoid contributing to the significant impacts that motorized recreationists have experienced from the cumulative effect of all closures. A reasonable alternative would incorporate all existing motorized roads and trails and restrict motorized travel to those travel ways. Under the requirements of NEPA, all reasonable alternatives should be addressed in the environmental document and decision-making. In order to avoid contributing to further cumulative negative impacts, we request that an alternative based on incorporating all existing motorized roads and trails and restricting motorized travel to those travelways be included in the analysis and selected by the decision-makers.

Issue:
243 The environmental document should consider the following visitor profiles in addition to OHV enthusiasts as motorized visitors who use roads and trails within public lands. People out for weekend drives, sightseers, picnickers, campers, hunters, hiking, rock climbing, target shooters, fisherman, snowmobile enthusiasts, woodcutters, wildlife viewing, berry and mushroom pickers, equestrians, mountain hikers, and physically challenged visitors who must use wheeled vehicles to visit puhlic lands. All of these multiple-use visitors use roads and motorized trails for their recreational purposes and the decision must take into account motorized designations serve many recreation activities, not just recreational trail riding. We request that the significant impact from all cumulative statewide-motorized closures on all of these visitors be included in the environmental document. A statewide analysis is required because cumulative negative effects are forcing all motorized visitors to travel farther and farther to fewer and fewer places to find motorized access and recreation opportunities.

Issue:

Responses

O3-237: Each alternative includes a travel management section. However, an alternative dedicated solely to travel management would minimize the importance of other factors for which BLM must plan.

O3-238: Existing levels of travel opportunities are based on a very old plan that must be updated to reflect changing conditions. There have been no past strategies to eliminate motorized recreational opportunities, except in cases where protection of sensitive resources required doing so. Also see response O3-124.

O3-239: Please see response O3-45.

O3-240: Each alternative includes a travel management section. However, an alternative dedicated solely to travel management would minimize the importance of other factors for which BLM must plan. Also see response O3-144.

O3-241: Please see responses O3-124, O3-5 and O3-45.

O3-242: Each alternative includes a travel management section. However, an alternative dedicated solely to travel management would minimize the importance of other factors for which BLM must plan. Also see responses O3-124, O3-5 and O3-45.

O3-243: Such analysis is beyond the scope of this RMP.

Comments

O3 (Cont.)

244 Visual and other impacts associated with motorized trails have been cited as significant negative impacts. Many non-motorized trails have environmental impacts similar to motorized trails. Existing wilderness and non-motorized areas include many trails that are visually and functionally similar to primitive motorized roads and motorized trails. For example, the Mount Helena trails, and the main trails into the Bob Marshall and Scapegoat Wilderness at Benchmark, Holland Lake, and Indian Meadows and the main trails into the Anaconda Pintler Wilderness are similar visually and functionally to many primitive motorized roads and motorized trails. Additionally, trails resulting from activities including wild animals and Native Americans have always been a part of the natural environment. We request that the existence of trails be considered part of the natural landscapes, and that the visual appearance of motorized trails and non-motorized trails he recognized as equal in most cases and that the environmental impacts of motorized and non-motorized trails be addressed fairly and equally.

245 Issue:
If the issue of cross-country motorized travel is significant enough to justify closures, then the issue and restrictions should also he applied to cross-country hiking and mountain climbing. Motorized recreationists relinquished cross-country travel opportunities as part of the Three-State OHV and National BLM Record of Decision. Because of this wholesale action, motorized recreationists gave up recreational opportunities such as retrieval of big game and trials bike riding in areas where cross-country travel was acceptable. Cross-country hiking and mountain climbing also create trails that provide visible evidence of human activity. Non-motorized trails and motorized trails are often equal in visual and resource impact.

246 Issue:
Page 57 of Big Snowy Mountains Access and Travel Management Decision Notice. *Specifically, the following table an motarized and non-motorized raads/trails on the Lewis and Clark Natianal Forest indicates a mix af opportunities.*

With the elimination of cross-country travel and millions of acres of area closures, motorized recreational opportunity can only be expressed as miles of roads and trails open to OHV visitors. Land area in acres cannot be used as a measure of motorized recreational opportunity. However, non-motorized recreational opportunities can be measured in acres of cross-country travel area available and miles of trails available. It is not equitable weigh motorized use on the same scale as non-motorized use. Non-motorized users are not held to the same standard as motorized use in that they are not confined to only trail access. Therefore, motorized recreational opportunities are limited to a set number of designated motorized routes while non-motorized recreational opportunities can include cross-country travel opportunities and are, therefore, unlimited. This distinction has not been adequately recognized and we request that this distinction and advantage be recognized in the analysis, formulation of motorized alternatives and decision-making.

247 Issue:
The use of the existing network of motorized roads and trails is part of local culture, pioneer spirit, heritage and traditions. All of these values have ties to the land. Visitors to public lands benefit from all of the motorized roads and trails that exist today. The quality of life for the multiple-use public is being impacted by the cumulative negative effects of all motorized and access closures. The significant closing of motorized routes in the project area does not meet the basic requirement of the NEPA act of 1969 as stated in "Sec. 101 (b) (5) *achieve a balance between papulation and resource use which will permit high standards af living and a wide sharing of life's amenities".* We

O3 (Cont.)

247 request that the criteria for high standards of living and a wide sharing of life's amenities include the preservation of motorized roads and trails based on the recognition of the values (ties to the land) that they provide to local culture, pioneer spirit, heritage, traditions, and recreation.

248 Issue:
The proposed action promotes management of our public lands as if they are public lands close to the large urban areas in California. If and when our population is equal to California, then an alternative could reasonably consider requirements necessary to manage urban impacts. Until then, local standards and culture should be the over-arching criterion.

249 Issue:
The prevailing trend of the past 35 ± years has been to close motorized recreation and access opportunities and not create any new ones. Additionally, roads or trails closed to motorized access are seldom, if ever, re-opened. The underlying objective of the Bureau of Land Management and Forest Service has been to restrict the public to a few major roads within public lands. We request that the cumulative negative effects of these policies be thoroughly evaluated so that a reasonable travel management decision is made. The evaluation of cumulative negative impacts should include all associated impacts such as social, economic, cultural, and the recreation needs of motorized visitors. It should also address the dilemma facing motorized recreationists after so many closures, i.e., Where can motorized visitors go when a functional network of roads and trails is eliminated? How can the public enjoy public lands when there is a lack of adequate access and recreational opportunities? Where can our children and grandchildren recreate?

250 Issue:
We are concerned about the preservation of historic mines, cabins, settlements, railroads, access routes and other features used by pioneers, homesteaders, loggers, settlers, and miners. These are important cultural resources and should not be removed from the landscape. Western culture and heritage has been characterized by opportunities to work with the land and preservation of all remnants of this culture and heritage is important. Current management practices are not adequately protecting western culture and heritage including the opportunity to work with the land. We request that the ties to the land that are part of our local western culture and heritage be protected and that the preferred travel management alternative include opportunities to visit these features as part of motorized interpretative spur destinations and loops.

251 Issue:
We live in this area and accept the economic compromises of living here so that we can access and recreate on our public lands. We are fortunate to have an abundance of public lands and there is no valid reason why we should not have reasonable opportunity to enjoy them. Our local culture is built on the foundation of access to visit and use these lands. Now travel planning and other initiatives are severely restricting that access and recreational opportunities. We have only one lifetime to enjoy these opportunities and these opportunities are being systematically eliminated. The impacts of lost opportunities on motorized recreationists are significant and irretrievable and irreversible. We won't be living this life again. NEPA requires adequate evaluation and consideration of irretrievahle and irreversible impacts. We request that the evaluation and decision-making adequately identify and address these impacts. NEPA also requires adequate mitigation of irretrievable and irreversible impacts. We request that the decision-making provide for adequate mitigation to avoid the irretrievable and irreversible impacts of lost opportunities on motorized recreationists.

Responses

O3-244: The visual impacts of motorized and non-motorized trails are assessed utilizing a similarly methodology in accordance with BLM Visual Resource Contrast Rating Handbook, H-8431-1.

O3-245: Thank you for your comment. Use restrictions or trail closures may occur if resources are being significantly degraded due to any type of recreational use in accordance with 43 CFR 8364.1.

O3-246: Thank you for your comment.

O3-247: Please see response O3-3.

O3-248: BLM has solicited public comments during both the scoping and public comment periods, which it assumes reflect local values and needs. The RMP reflects input gathered during these processes. The regional population, which includes the Spokane and Coeur d'Alene metropolitan areas, was considered during development and analysis of the alternatives.

O3-249: Please see response O3-124.

O3-250: All of the alternatives support the preservation and interpretation of cultural resources. During implementation, all sites will be evaluated before any action would be initiated that may impact such resources. Please refer the cultural resource objectives and actions in Chapter 2.

O3-251: Please see response O3-124.

Comments

O3 (Cont.)

Issue:
Judge Molloy May 21, 2001 Order bottom of page 13. *In 1996, District Ranger Larry Timchak of the Judith Ranger District noted "While motorized users typically have a high tolerance for non-motorized recreationists, the reverse is typically not the case."*

252 We are concerned about the protection of our western culture. This culture is characterized by access to the land for multiple-uses, friendliness, good neighborliness, tolerance and sharing. Motorized access to the land provides opportunities for sightseeing, exploring, weekend drives and picnics, hiking, rock climbing, skiing, mountain biking, riding horses, camping, hunting, target shooting, fishing, viewing wildlife, OHV recreation, snowmobiling, accessing patented mining claims, gathering of firewood, rocks, natural foods, etc. and physically challenged visitors who must use wheeled vehicles to visit public lands. Both our observations and the Social Assessment for Beaverhead-Deerlodge National Forest found that these multiple-use visitors represent over 96% of the total visitors and that these visitors rely on motorized access. We are fortunate to have extensive public lands to support the western culture. While mechanized and multiple-use recreationists are tolerant of others as noted by the District Ranger, this does not mean that non-motorized interests should be allowed to dominate resource allocation decisions. We request that multiple-use management principles be used to protect western culture and values including access to the land for multiple-uses, friendliness, good neighborliness, tolerance and sharing.

Issue:
253 Our public lands are a tremendous national resource both in total area and features. Public lands should be available for conflict-free use and enjoyment by everyone. Unfortunately public lands have been turned into a conflict zone by non-motorized fanatics. What is right about this situation? It is a great disservice to the public. We request a management initiative be introduced that will return public lands for the use and enjoyment of everyone for once and for ever.

Issue:
254 The environmental document should evaluate how the number of policy proposals over the past several years has overwhelmed the public. There is no way that the public could evaluate and comment on each proposed action (see partial listing of actions in Table 2). The cumulative negative impact of the overwhelming number of proposals has been decision-making that does not provide for the needs of the public and a significant reduction in multiple-use and motorized access and recreation opportunities. We request that this cumulative negative impact be adequately evaluated and factored into the decision-making for this action. Additionally, we request that an adequate mitigation plan be included as part of this action to compensate for past cumulative negative impacts on the public associated with the overwhelming number of NEPA actions.

Issue:
255 Motorized visitors have had to devote the majority of their available energy and time addressing local and national level travel management actions. The combination of these actions has created a significant cumulative negative effect on motorized visitors by consuming their free time and money, and significantly impacting their quality of life.

Additionally, this cumulative negative effect has lead to the loss of opportunity for motorized recreationists to further the awareness and education of other motorized visitors in areas such as proper riding ethics, safety, and environmental protection. This cumulative negative effect has also

O3 (Cont.)

255 reduced the opportunity for motorized recreationists to improve and maintain existing motorized opportunities. This cumulative negative impact includes reduced maintenance of trailheads and trails and reduced ability to undertake mitigation projects to protect the environment and public safety. We request that these cumulative negative effects be addressed in the analysis, preferred alternative and decision-making.

Issue:
256 With the agency's commitment in the current management plan to the application of "Limits of Acceptable Change" (LAC) for determining management strategies there is an inherent obligation on the agency's part to provide specific direction that certain measures, such as visitor education and the provision of new facilities, would be implemented before limiting use. A common thread in LAC application nation-wide is that these regulations apply to all visitors, not to specific groups. Why are motorized recreationists being disenfranchised from this directive? There has not been an adequate attempt by the agency to educate the public that areas and trails in the project area or anywhere else must be shared by all users and that new facilities are needed to address the needs of motorized recreationists. The decision for this project must correct this deficiency.

Issue:
257 Motorized recreationists are very concerned that a reasonable alternative will not be adequately addressed in the environmental document and decision-making and that the process is predisposed. To prevent this from happening again, we request a Multiple-Use Review Board be established to assure that the decision-making reflects the multiple-use management goals and the needs of the public. We request that a Multiple-Use Review Board look into all past travel management decisions within public lands to determine whether all decisions have adequately considered the needs of multiple-use and motorized recreationists. Where decisions have not adequately considered the needs of multiple-use and motorized recreationists, we request that the reasons be identified and that corrective actions be taken.

Issue:
Oftentimes, the text and maps in travel management documents do not effectively communicate or describe to motorized visitors the trails and roads that they are accustomed to visiting. Therefore, motorized visitors do not realize that the Agency proposes to close many of the roads and trails that have been used for decades by generations of motorized visitors.

The public has not developed a clear understanding as to what is about to happen to the roads and trails that they routinely visit because the travel management process has not effectively communicated the extent of the roads and trails proposed for closure. Instead, the public will go out
258 to their favorite road and trail and find it closed to their use after the proposed action is enacted.

It will take different approaches to effectively communicate to the public, which roads and trails are subject to the proposed action. For example, one alternative communication method could include posting of the roads and trails proposed for closure with signs for a period of 1 year prior to the EIS process stating "Road or Trail Proposed for Closure, for more information or to express your opinion please call xxx-xxxx or send written comments to xxxxx."

Other methods could include the use of information kiosks and trail rangers as discussed in other sections. We request a commitment by the agencies to these sorts of direct communications with

Responses

O3-252: Please see response O3-124.

O3-253: Your suggestion is similar to the Overall Vision for the planning area described in Section 1.9.

O3-254: BLM has had very few travel management related actions concerning lands in the planning area, in the past several years. Incorporation of a detailed travel management plan in this document is actually intended to reduce the number of actions for the public. According to BLM policy, designation of routes for travel management is not an RMP decision, but is left for implementation level planning. However, in order to reduce the number of planning projects and maximize public participation, BLM decided to incorporate this into the CdA RMP.

O3-255: Please see response O3-124.

Impacts must be attributable to the proposed action or alternatives for their analysis to be required.

O3-256: Comment pertains to a different plan. The term "limits of acceptable change" is not used in this plan.

O3-257: Thank you for your suggestion.

O3-258: Thank you for your comments. See responses O3-17 and O3-49.

Comments

O3 (Cont.)

258 motorized visitors to reach and involve them. NEPA does not preclude these types of methods and, in fact, requires the process to be user friendly.

Issue:
259 Current management philosophy seems to be that the only way to address a problem is by closing access to public lands. Eliminating opportunities does not solve problems. An approach that is more reasonable to the public including motorized visitors is to maintain recreation opportunities by addressing problems through mitigation measures such as education, signing, seasonal restrictions, user fees, and structural improvements such as water bars, trail re-routing, and bridges. There may be problems with certain motorized roads and trails but we should work to solve and mitigate them and not to compound them by enacting more closures. We request the agencies to support and use mitigations and education as a means to address and mitigate problems rather than closures.

Issue:
260 Most problems associated with visitors can be addressed by education. Education should be the first line of action and all education measures should be exhausted before pursuing other actions. There are situations were education is far more effective than law enforcement. The elimination of much needed recreational opportunities is not reasonable without first exhausting all possible means of education to address the problem. Educational programs could include use of mailings, handouts, improved travel management mapping, pamphlets, TV and radio spots, web pages, newspaper articles, signing, presentations, information kiosks with mapping, and trail rangers.

Restrictions or closures are not always obvious to the public. Education can also be in the form of measures such as the use of jackleg fences with signs at the end of motorized trails in sensitive areas so that public is made aware of the end of the motorized trail and the surrounding area closure. The use of public education to address problems may require effort and time but it is more reasonable than the use of closures. We request the full use of education to address visitor problems. Additionally, individual motorized recreationists and groups can be called upon to assist with the implementation of the educational process.

Issue:
261 An alternative to motorized closures in many cases would be to keep motorized opportunities open and use education on principles such as those found in the Tread Lightly program and Blue Ribbon Coalition Recreation Code of Ethics and Principles to address and eliminate specific issues associated with motorized recreationists. These efforts could include the use of pamphlets, information kiosks, and presentations. Education can also be used to address and eliminate issues associated with non-motorized recreationists by encouraging their use of reasonable expectations, reasonable tolerance of others, and reasonable sharing of our land resources.

To date, educational measures have not been adequately considered, evaluated or implemented. We request that educational measures be incorporated as part of this proposed action and that the cumulative negative impact on motorized recreationists of not using education in all past actions involving motorized recreational opportunities be addressed. Additionally, we request that an adequate mitigation plan be included as part of this action to compensate for past cumulative negative impacts associated with inadequate use of education measures in past actions.

Issue:

O3 (Cont.)

Management of public lands to maximize wild game populations at the expense of other uses is not reasonable and does not meet the requirements of multiple-use laws and policies. We support hunting but we question why hunting's impact on wildlife is acceptable and non-destructive viewing by motorized visitors is not acceptable. We are concerned that public lands that were designated for multiple-use management are not being managed for multiple-use as required under:

1. The Multiple Use Sustained Yield Act of 1960 (16 U.S.C. 528 et seq.) defined Multiple-Use as "*The management of all the various renewable surface resources of the national forests so that they are utilized in the combination that will best meet the needs of the American people...*". Outdoor recreation is the first stated purpose of the act.
2. Public Law 88-657 states that "*the Congress hereby finds and declares that the construction and maintenance of an adequate system of roads and trails within and near the national forests and other lands administered by the Forest Service is essential if increasing demands for timber, recreation, and other uses of such lands are to be met; that the existence of such a system would have the effect, among other things, of increasing the value of timber and other resources tributary to such roads; and that such a system is essential to enable the Secretary of Agriculture (hereinafter called the Secretary) to provide for intensive use, protection, development, and management of these lands under principles of multiple use and sustained yield of products and services*".
3. The Federal Land Policy and Management Act of 1976 (FLPMA) states that "*(7) goals and objectives be established by law as guidelines for public land use planning, and that management be on the basis of multiple use and sustained yield unless otherwise specified by law;* and, *(c) In the development and revision of land use plans, the Secretary shall -- (1) use and observe the principles of multiple use and sustained yield set forth in this and other applicable law;*".
4. The BLM Strategic Plan FY 2000 to 2005 states that: "*To achieve this mission, the Bureau of Land Management follows these principles: Manage natural resources for multiple use and long-term value, recognizing that the mix of permitted and allowable uses will vary from area to area and over time.*"

262 We request careful consideration of the multiple-use needs of the public and implementation of the objectives of multiple-use laws and policies as part of the proposed action.

Issue:
263 The roads and trails in the project area are not new or "user created" travelways. These roads and trails have existed for many years. The public has relied on them for access for many years and for many purposes. This pattern of use is well established. A reasonable travel management alternative would use area closure to prevent the creation of unwanted trails by visitors and, at the same time, allow the public to use all of the existing motorized routes. Too many management actions have been enacted without the development of this reasonable alternative. The cumulative negative impact of the travel management process on motorized access and recreation opportunities has been significant. We request that the preferred alternative be based on the existing motorized routes that are considered important resources by motorized recreationists.

Issue:
264 A reasonable Travel Management alternative would maintain existing travelways that provide motorized recreationists with a system of loops and destinations. The preferred alternative should provide access to motorized looped trail systems, spurs for exploration and destinations, and

Responses

O3-259: Thank you for your suggestion.

O3-260: Public education is a key component of conservation under all action alternatives. Proposed actions include educating visitors about weed infestation and transport, wildlife habitat needs, and open and closed areas.

O3-261: Thank you for your suggestions and comments. The BLM routinely takes public outreach actions to communicate with and educate recreation users in implementing RMP decisions.

O3-262: Please see response O3-3.

O3-263: Please see response O3-240.

O3-264: The planning of individual timber sales is an implementation action not addressed in the RMP. Also see responses O3-124 and O3-45.

Comments

O3 (Cont.)

264 motorized access to areas located outside the project area. We request that the cumulative negative effect of reduced recreation and access opportunities for motorized visitors within the project area be adequately considered in the document and decision-making. The cumulative negative effect of eliminating motorized access to loop trail systems, provide exploration opportunities and destinations outside of the project area should also be adequately considered in the document and decision-making.

265 Issue:
Current management trends are attempting to restrict public access to narrow corridors along major roads. This management trend is widespread among all agencies. If allowed to continue, this trend will concentrate over 95% of the visitors to less than 10% of the area. The cumulative negative impact from concentrating visitors to narrow corridors will result in poor management of public lands and unreasonable access to public lands and recreational opportunities. We request the evaluation of the cumulative negative impacts from management goals that tend to concentrate visitors to narrow corridors and reduce recreation opportunities for motorized visitors. Other associated negative impacts that should also be evaluated include loss of dispersed recreation opportunities, reduced quality of recreation, loss recreation diversity, and unequal allocation of recreation opportunities.

266 Issue:
OHV and other motorized recreationists seek the challenge and sense of exploration that primitive roads and motorized trails provide. The preferred travel management alternative should not restrict motorized access and recreation to narrow corridors along a few major roads. This restriction would not provide for the type of experiences that most motorized visitors are seeking and, therefore, does not meet the needs of motorized visitors. We request that the analysis and decision-making avoid restricting motorized access and recreation opportunities to narrow corridors along major roads.

267 Issue:
In the past, timber harvests have been conducted without consideration for maintaining existing motorized trails through the area. Therefore, motorized recreation opportunities have been eliminated as part of timber sales. The Little Blackfoot and Telegraph Creek areas are examples of motorized closures does as part of timber harvests that have fragmented the motorized road and trail system. Now as mitigation measure to offset the significant impact from the cumulative effect of all past actions, motorized trail systems should be developed using timber sale roads and trails. Existing timber sale roads and trails should be inter-connected by construction of new trail segments or rehabilitation of existing trail segments to provide mitigation for lost motorized recreation opportunities. Connector trails should be constructed to avoid dead-end trails. These systems could provide recreation opportunities for a variety of skill levels and visitors.

268 Issue:
In some cases conflict of uses has been created by Visitors Maps that are not consistent with Travel Plan maps. All visitors (motorized and non-motorized) need to clearly understand what areas, roads or trails are open for motorized travel and what areas, roads, or trails are closed to motorized travel. We have experienced a number of misunderstandings by both non-motorized and motorized visitors. We recommend that the Travel Plan Map and Visitors Map be the same and that this combination map should include as much detail as possible (such as contour information) so that the public can better determine the location of roads and trails that are open or closed.

O3 (Cont.)

269 Issue:
There is a significant need to standardized signs within and across all agencies. For example, there are often misunderstandings about seasonal motor vehicle restrictions due to the "No" symbol with the actual closure period shown below in small text that is often not seen or understood. In this case, the road or trail is open except during the period show below but the sign is often misinterpreted as closed. We suggest that travel management signs be made easier to understand and standardized. Signs are the backbone of a good management program. Some examples of how signs could be used to implement management are:

- Signs should be displayed at key access points to public lands explaining the basics; "OHV's allowed on designated routes to protect foliage and prevent erosion"; "Expect to see other visitors on the trails – shared trail area"; "Report violations to 1-800-TIP-MONT"; etc.
- Trailhead signs should not only list restrictions but should also tell visitors what to expect. Signs that say "expect to see other trail users" with universal symbols indicating the uses they can expect to see would work well. This approach is used successfully in nearly every forest across the country except those in Forest Service Region 1.
- Reinforce travel allowed and restricted at intersections.
- Reinforce important messages; say the same thing in a different way.

270 Issue:
Along with the standardization of signs, there is also a significant need to standardize or simplify seasonal closure dates as much as possible. We suggest that the number of different closures periods should be kept to a maximum of two, if possible, in order to avoid confusion and resulting misunderstandings.

271 Issue:
The environmental document should be an issue driven document as required under NEPA and guidelines published by the Council on Environmental Quality. The driving travel management issue is the development of a reasonable alternative that meets the needs of the public. NEPA requires that all reasonable alternatives be evaluated. We request that the environmental document include a travel management alternative that is responsive to the public's multiple-use needs. A reasonable alternative would incorporate all existing motorized roads and trails and restrict motorized travel to those travel ways. A reasonable travel management alternative should provide a continuous system of roads and trails on which off-highway vehicles can be legally ridden. A reasonable travel management alternative is needed in order to avoid contributing to the significant impact that cumulative negative impacts have had on motorized recreationists. In order to avoid contributing to further cumulative negative impacts we request that the preferred alternative be based on incorporating all existing motorized roads and trails and restricting motorized travel to those travel ways.

272 Issue:
A reasonable alternative instead of all motorized closures is a sharing of resources. A reasonable alternative for accomplishing this can be done by designating alternating weeks for motorized and non-motorized use. The schedule can be communicated to the public by signs at each end of the trail segments, newspaper articles, and through local user groups. This alternative eliminates any reasonable concern about conflict of users (which we think is over-stated and over-emphasized based on reasons discussed elsewhere in this submittal).

Responses

O3-265: The proposed action makes no attempt to restrict public access to narrow corridors along main roads.

O3-266: Please see response O3-265.

O3-267: Please see responses O3-18, O3-45 and O3-111.

O3-268: Thank you for your suggestion. Please refer to Action TM-D.1.1.9.

O3-269: Please refer to Action TM-D1.1.9.

O3-270: Where seasonal restrictions are used, the proposed action adopts dates which match those used on the adjacent National Forests. This should help to avoid confusion and resulting misunderstandings.

O3-271: Please see responses O3-124 and O3-240.

O3-272: Thank you for your suggestion.

Comments

O3 (Cont.)

273 Issue:
We are unaware of any documented or justifiable reports of user conflict in the project area. We request copies of any documentation of user conflicts in the area and request that it be categorized and weighed against the overall number of visitor-days to the area. Additionally, a difference in opinion about whether certain recreationists should be able to visit multiple-use public lands should not be considered a user-conflict.

274 Issue:
Executive Order 11644 was passed on February 8, 1972 and Executive Order 11989 was passed on May 24, 1977. These Executive Orders have been used to enact thousands and thousands of motorized access and recreation closures since the 1970's. The cumulative negative effect of Executive Orders 11644 and 11989 has been a dramatic loss of recreation and access opportunities for motorized recreationists and a dramatic increase in recreation opportunities for non-motorized recreationists.

Executive Orders 11644 and 11989 allow agencies to "minimize conflicts among the various uses". The Executive Orders did not state "minimize conflict with other users". However, the implementation of Executive Orders 11644 and 11989 has been largely based on the incorrect interpretation to "minimize conflict with other users". The bottom line is that "use" conflict is rather different from "user" conflict. There are certainly "uses" that are incompatible from an objective standpoint. For example, a ski run and a mine cannot operate in the same place at the same time...it is physically impossible and therefore a clear "use conflict." However, in the case of a mine located next to a ski hill, both can operate without a use conflict.

275 Issue:
Whether there is a "user conflict" or not depends primarily on user attitudes. Just because someone says it is a conflict does not mean that it is a "reasonable" or "significant" conflict. We request that a reasonable definition for "significant" conflict be developed and used as part of this action.

276 Issue:
Conflict on multiple use trails: Synthesis of the Literature and State of Practice; Report No.: FWWA-PD-94-031 "Conflict in outdoor recreation settings (such as trails) can best be defined as "goal interference attributed to another's behavior" (Jacob & Schreyer 1980, 369). As such, trail conflicts can and do occur among different user groups, among different users within the same user group, and as a result of factors not related to users' trail activities at all. In fact, no actual contact among users need occur for conflict to be felt. Conflict has been found to be related to activity style (mode of travel, level of technology, environmental dominance, etc.), focus of trip, expectations, attitudes toward and perceptions of the environment, level of tolerance for others, and different norms held by different users. Conflict is often asymmetrical (i.e., one group resents another, but the reverse in not true).

277 Issue:
The use of Executive Orders 11644 and 11989 to "minimize conflict with other uses" should be evaluated from the perspective of "fair-mindedness of expectations". To provide non-motorized experiences we have designated and set-aside wilderness/non-motorized use areas. Just as motorized recreationists do not expect to be able to use motorized vehicles in wilderness/non-motorized use areas, non-motorized enthusiasts should not expect to go to multiple-use areas and

O3 (Cont.)

277 experience wilderness conditions. If some non-motorized recreationists cannot accept motorized recreationists in multiple-use areas, then they need to become familiar with travel plan maps and restrict themselves to the many wilderness/non-motorized areas that are available to them.

278 Issue:
Congress has recognized the need to share our lands for multiple-uses and has directed federal land agencies to manage for multiple-uses under laws including the Federal Land Policy and Management Act of 1976, Multiple Use Sustained Yield Act of 1960 and Public Law 88-657. Executive Orders 11644 and 11989 tend to conflict with these multiple-use directives. These two executive orders interfere with the management of public lands for multiple-uses and promote non-sharing and intolerant attitudes. We request that the analysis, preferred alternative and decision-making not let Executive Orders 11644 and 11989 interfere with an equitable management of public land for multiple-uses.

279 Issue:
Executive Orders 11644 and 11989 promote intolerance and non-sharing in a manner that allows one group of recreationists to eliminate another group of recreationists from public lands. The Sierra Club ORV Manual (http://www.sierraclub.com/chapters/id/orv/index.htm) states, "*Remember, one adverse impact is "user conflict". We are advising a wonderful legal tactic. Next time you are on a hike and a dirt bike roars by, get 40 friends to all call or write to the Forest Supervisor and say, We demand immediate closure of the trail to dirt bikes....*". Other organizations such as Wild Wilderness provide Incident Reporting Forms (http://www.wildwilderness.org/wi/report.htm) to report conflicts with visitors using vehicles and encourage the use of these forms. The National Wildlife Foundation in their June and July 2004 issues of Ranger Rick Magazine presented a strongly anti-OHV cartoon to its readers. As demonstrated by these examples, some non-motorized interests are in the conflict business because they stand to gain by creating conflicts. Actions by some non-motorized special-interests have gotten to the extreme where they should be considered harassment. All visitors to public lands must respect each other and accommodate each other with reasonable expectations and reasonable actions. We have always been respectful of other visitors and have never observed a conflict between non-motorized and motorized visitors during our visits to public lands spanning 40 years.

All users of multiple-use lands must be willing to share and tolerate with all others. Motorized visitors are willing to share and tolerate other visitors. A small minority of non-motorized visitors should not be able to inflict such a large impact on the majority of visitors. We request that the significant negative and inequitable impacts that Executive Orders 11644 and 11989 have imposed on motorized recreationists be adequately evaluated, and factored into the preferred alternative. We request that the decision-making provide for actions necessary to provide responsible use of these two Executive Orders.

280 Issue:
User conflict is vastly overstated by non-motorized recreationists for self-serving reasons. This overstatement is confirmed by data collected by the Wildlands Center for Preventing Roads (http://maps.wildrockies.org/orv/database.html). This organization has assembled all of the conflict of users data available from the Forest Service. Records from 134 national forests indicate a total of 1,699 noise violations, 145 smoke violations, and 1,272 safety violations for a total of 3,116 violations during the period from 1987 to 1998. The average violations per year would equal 283 or about 2 violations per forest per year. Most likely, many of these violations were not related to OHV

Responses

O3-273: As examples, please refer to several of the other comments we received for this RMP. Specifically see P1, P2, P3, P4, P5, P8, P11, P19, P21, P30, P36, P40, P41, P43, P45, P53, O4 and O5.

O3-274: Thank you for your comment.

O3-275: The BLM Land Use Planning Handbook (H-1601-1)(BLM 2005) defines planning issues as "disputes or controversies about existing and potential land and resource allocations, levels of resource use, production, and related management practices." BLM identified the planning issues during scoping, as described in Section 1.4.

O3-276: Thank you for your comment.

O3-277: Thank you for your comment.

O3-278: All executive orders must be considered and complied with by any federal agency in a planning document.

O3-279: Thank you for your comment. Please see response to O3-278.

O3-280: Thank you for your comment.

Comments

O3 (Cont.)

280 recreationists. Motorized recreationists are committed to reducing the number of violations and using education to increase public awareness of visitor and land use ethics. However, considering the tens of millions of visitors to our national forests during this 11-year period, the 3,116 violations are statistically insignificant and do not support the argument that user conflict is a significant problem. Lastly, the total number of violations reported in Northern Region forests was zero.

281 Issue:
Over the past 4 years we have met 133 hikers in the multiple-use public lands areas that we visit. There have been no conflicts during these meetings. In fact, most often we have stopped and visited with these hikers and exchanged information. At the same time over the past 4 years we have observed well over 8,000 motorized recreationists. We have coexisted for years without any measurable conflict. Why is coexistence suddenly considered such a problem by some people? We are concerned that this position has been taken for self-serving reasons. There is no evidence of any real conflict. Motorized recreationists could complain about the presence of non-motorized recreationists but we have chosen not to complain and we have adopted an attitude of sharing. Motorized recreationists should be given credit for being reasonable and willing to share.

282 Issue:
In our locale, we see so few non-motorized recreationists on multiple-use trails that we cannot understand how a conflict of uses could be substantiated. Additionally, it is not reasonable for non-motorized users to claim a conflict of uses based on their observation of motorized wheel prints on a road or trail (do they feel the same way about mountain bikes?). It is not reasonable to provide one group of recreationists with the opportunity to claim a "conflict of uses" and use that as a basis to deny other recreationists equal access to public lands. This form of conflict creation and then resolution by elimination of motorized recreational opportunities is not equitable.

The reasonable and equitable way to deal with differences is to accept each others difference. How else can diversity survive? All of us have a responsibility to accept and promote diversity of recreation on public lands. An unwillingness to accept diversity is a fundamental failing of those who seek to eliminate things that don't fit their perspective. Diversity of recreation opportunities can only be accomplished through management for multiple-use and attitudes that promote tolerance, sharing and coexistence. Behaviors that are non-sharing or intolerant of other recreationists on public lands should not be rewarded yet it is. The continual loss of motorized access and recreational opportunities and the negative attitudes toward multiple-use recreationists is seriously degrading our culture and quality of life. We request that elimination and restrictions of recreation opportunities not be imposed on motorized visitors because other visitors are not able to share and be tolerant. We request that revisions to Executive Orders 11644 and 11989 be made in order to return equitable guidance to federal land-use managers.

283 Issue:
During the 1970's, when Executive Orders 11644 and 11989 were created, snowmobile and motorcycles were much louder than today's machines. Concern with sound levels lead to the creation of Executive Orders 11644 and 11989. Today's technology provides machines that are significantly quieter than in the 1970's. Furthermore, the technology now exists to make vehicles even quieter. Therefore, concern with sound levels can be mitigated by establishing a reasonable decibel limit for exhaust systems. States such as California and Oregon have enacted sound emission limits. We encourage all jurisdictions to adopt the stationary sound test procedures as set forth in the Society of Automotive Engineers J-1287 June 1980 standard. Public land-use agencies

O3 (Cont.)

283 could establish reasonable sound limits and use this approach to address the sound level issue. This alternative would be more equitable than closures. We request that this reasonable alternative to motorized closures be pursued and incorporated into the preferred alternative and decision-making.

284 Issue:
It is not reasonable to enact motorized closures based on the issue of sound when viable alternatives could be pursued. The Sierra Club's in their ORV Handbook makes the following statement "*The fact is that most ORV noise is unnecessary; even motorcycles can be muffled to relatively unobjectionable noise level*". We request that agencies initiate an education campaign (loud is not cool) to promote the development and use of quiet machines. OHV brochures such as those published by the Wallowa-Whitman National Forest include public awareness information on the importance of sound control.

285 Issue:
We request that the process include consideration of the negative impacts that proposed motorized road and trail closures will have on fire management, fuel wood harvest for home heating, and timber management. The analysis should include an analysis of the benefits to the public from the gathering of deadfall for firewood from each of the roads and trails proposed for closure. These analyses are especially significant following a devastating fire season and a period of rising energy costs. The need for firewood gathering is increasing given the increasing energy costs (http://www.helenair.com/articles/2003/11/02/montana/a01110203_05.txt) and we have noticed a significant increase in firewood gathering this past year. The closure of roads and trails is occurring at a large scale on all public lands. Therefore, the analysis should also evaluate the cumulative negative impacts of motorized road and trail closures and the conversion of multiple-use lands to limited-use lands on fire management, timber management, and firewood gathering.

286 Issue:
Page 215 of the Supplement to Big Snowy Mountains EA. *Solitude is a personal, subjective value defined as isolation from the sights, sound and presence of others, and the development of man.*

We acknowledge the value of solitude and point out that there are many acres of wilderness/non-motorized/exclusive-use available to provide that solitude. Our concern is in regards to the diminishing amount of multiple-use lands and the unreasonable concept that multiple-use lands should be managed as wilderness/non-motorized/exclusive-use lands. Managing multiple-use lands by wilderness criteria and for perfect solitude does not meet the communal needs of the public and is not a reasonable goal for multiple-use lands.

The opportunity for solitude must be reasonably balanced with the multiple-use needs of the public. For example, the Montana Standard in an article on December 14, 2000 reported that hikers on the Continental Divide trail "walked for 300 miles without seeing another human being". This article illustrates a significant long-distance interstate recreational opportunity available to non-motorized visitors and the negligible use that it sees. Additionally, we have been camping in the Telegraph Creek drainage for 27 years and we have met only 2 people using the CDNST in that area. In contrast, a long-distance interstate recreational opportunity similar to the CDNST does not exist for OHV recreationists.

It is not equitable to provide recreationists seeking solitude and wilderness experiences exclusive access to tens of millions of acres and thousands of miles of non-motorized trails while restricting

Responses

O3-281: Thank you for your comment.

O3-282: Amendment of Executive Orders is the prerogative of the President and is beyond the scope of the RMP.

O3-283: Thank you for your suggestion.

O3-284: On BLM lands it is prohibited to operate an off-road vehicle in violation of State laws and regulations (43 CFR 8341.1(d)). The state of Idaho limits noise emission to a base level of not more than ninety-six (96) decibels when measured on the "A" scale using standards and procedures established by the society of automotive engineers (SAE), specifically SAE standard J1287, June, 1988. (IC 67-7125) The proposed action would establish no additional noise restrictions and noise was not a factor used in designating routes.

O3-285: Fire wood gathering is permitted on most BLM land. We are not aware of a shortage of fuel wood gathering areas in the planning area and public scoping did not identify this to be an issue.

O3-286: Thank you for your comment. Please see responses O3-124, paragraph 1 and O3-45, paragraph 2.

Comments

O3 (Cont.)

286 the public seeking multiple-use opportunities access to an inadequate road and trail system. We request an equitable and balanced allocation of motorized access and recreational opportunity.

287 Issue:
We have seen a low level of use used as a factor to close motorized routes. This criterion should also be applied equally to non-motorized routes. For example, a low level of use hy motorcycles was used as a reason to close the Nez Perce trail in the Beaverhead-Deerlodge National Forest. This same reason should be used to open up non-motorized trails experiencing a low level of use to motorized use.

288 Issue:
When considering the level of use for either keeping a road or trail open or closed, the evaluation must recognize that motorcycle use and tracks are far less obvious on the ground than atv tracks.

289 Issue:
We request a network of national recreation trails for motorized recreationists equivalent to the Continental Divide Trail (CDT), Pacific Crest Trail, National Recreation Trail and other national non-motorized trails that travel a long distance and interconnect with other forests. If motorized recreationists had trails of regional and national significance, they would see considerable use. Non-motorized recreationists have considerably more national trail recreation opportunities than motorized recreationists. We request that the needs of motorized recreationists for regional and national travelways he evaluated. We request an evaluation of the cumulative negative impacts and environmental justice issues surrounding the lack of regional and national motorized trails for motorized recreationists. We request that regional and national motorized recreational trails be identified and actions be taken to implement those trails.

290 Issue:
The Elkhorn Wildlife Management Area in the Helena National Forest is an example of management of an area for a relatively narrow range of public needs. The underlying management criterion in the Elkhorn area is for ideal wildlife conditions and not for the diverse needs of the public. The diverse need of the public can only be met by management for multiple-use. While there are designated routes within the area, they are mostly roads with no challenge and limited access to interesting areas and features. There are few OHV loops or destinations. Roads and trails such as those in Section 1 and 11, T6N, R2W; Sections 13 and 4, T6N, R3W; Sections 31 and 31 in T7N, R2W; Section 36, T7N, R3W; Sections 25, 35, and 36, T8N, R1W and others could have been kept open for summer season recreation use and closed during calving and hunting seasons where necessary for wildlife management. Instead, they were closed. The alternative of seasonal closures would have benefited far more people and still maintained a more than reasonable wildlife habitat.

Additional Suggestions for Management of Motorized Recreation

291 1. Unfortunately rules oftentimes go to the lowest common denominator, i.e., the guy doing the most irrational things. Agencies are encouraged to keep rules as simple as possible and focused on addressing problems that are common and not the exceptions. Motorized recreationists can be called upon to help address the exceptions.
292 2. Agencies are encouraged to keep all existing trail systems open to motorized visitors.
293 3. Agencies are encouraged to add all existing road ands trails that are not on the trail system inventory to the roads and trail inventory.

O3 (Cont.)

294 4. Agencies are encouraged to return trails that used to be on trail inventories to the current inventory.
295 5. Where possible, agencies are encouraged to provide trailheads for motorized trails that are convenient to urban areas.
296 6. Where possible, agencies are encouraged to provide trailheads for motorized trails that are located at the boundary of urban areas and trails that connect urban areas to public lands and form motorized recreation opportunities similar to the Paiute Trail in Utah (http://www.marysvale.org/paiute_trail/contents.html).
297 7. Agencies are encouraged to insure that access to trails is not blocked by private lands and that private landowners do not have special access privileges. Where private landowners have elected to block public access to public lands, the boundary between that landowner and public land should be closed to motorized access using a "boundary closure" in order to avoid special access privileges for private landowners onto public land. Motorized access for the public on the public lands side should remain open to the boundary closure and the acquisition of public right-of-way should be pursued with the private landowner.
298 8. Agencies are encouraged to keep motorized access through private land open to the public. Every public access closure through private land should be challenged and protected by asserting legal right-of-ways. The cumulative negative impact of this lack of action has created private motorized reserves on public lands or defacto wilderness/non-motorized/exclusive-use areas accessible only to private landowners.
299 9. Agencies are encouraged to acquire private land and right-of-ways to provide access to public land that is now blocked off to the public. This action is necessary to reverse the prevailing trend over the past 35 ± years of less access to public land and the significant impact that the cumulative effect of closure after closure has had motorized access and motorized recreation.
300 10. Implement seasonal closures, where required, with input and review by OHV recreationists that will: (1) provide the maximum amount of OHV recreational opportunity during the summer recreation season in order to disperse all forms of trail use and thus minimize impacts to trail users; (2) provide winter OHV recreation opportunities in low-elevation areas that are not critical winter game range; (3) provide OHV recreation and access during hunting season by keeping major roads and OHV loops open while closing spur roads and trails necessary to provide reasonable protection of game populations and a reasonable hunting experience; and (4) provide OHV recreation opportunities during spring months in all areas where erosion and wildlife calving conditions reasonably allow.
301 11. Existing seasonal closures tend to separate the motorized and non-motorized peak use seasons. One size does not necessarily fit every circumstance but standardize or simplify seasonal closure dates as much as possible. The number of different closures periods should be kept to a maximum of two, if possible, in order to avoid confusion and resulting misunderstandings.
302 12. Motorized recreationists would be willing to accept area closure when necessary to protect the natural environment in exchange for a reasonable network of OHV roads and trails.
303 13. In areas where OHVs must use a roadway, travel management plans should include the designation of dual-use roads to allow OHV's to move from one trail segment to another.
304 14. Provide open or play areas for motorized recreation opportunity and trials bikes where acceptable in selected areas.
305 15. Motorcycle trail riders enjoy riding single-track trails. Motorized single-track recreation trails are limited at this time and continue to decline. Some BLM and FS districts do not differentiate between ATV and motorcycle trails in their travel plans. Evaluations and travel plans should differentiate between ATV and motorcycle trails.
306 16. Single-track trails that are not appropriate for ATV use should he kept open for motorcycle use.

Responses

O3-287: Level of use is a factor used when determining a route's maintenance level.

O3-288: Thank you for your comment.

O3-289: Please see response O3-2. Analysis of regional trail systems is beyond the scope of this document.

O3-290: Thank you for your comment.

O3-291: Thank you for your suggestion.

O3-292: Please see response O3-124, paragraph 1.

O3-293: Please see response O3-17.

O3-294: Please see response O3-17.

O3-295: Please see response O3-111.

O3-296: Please see responses O3-2 and O3-111.

O3-297: BLM can not discern access based on ownership.

O3-298: BLM has added Action LR-D2.1.11 to the Lands and Realty section of Alternative D to emphasize acquiring this type of access.

O3-299: Please see Action LR-D2.1.1. BLM has also added a Lands and Realty action (LR-D2.1.11) which would place emphasis on acquiring access through adjacent lands.

O3-300: Please see response O3-111.

O3-301: Please see response O3-111.

O3-302: Thank you for your comment.

O3-303: Please see response O3-144.

O3-304: No suitable areas have been identified on BLM lands within the planning area.

O3-305: Thank you for your suggestion. Refer to Maps 37-40.

O3-306: Thank you for your suggestion. Refer to Maps 37-40.

Comments

O3 (Cont.)

307 17. The number of "single track" motorcycle trails that motorcycle riders seek has been significantly reduced over the last 35 years.

308 18. The integrity of the "loop" trail system should be maintained. Loop systems minimize the number of on-trail encounters because non-motorized trail users don't encounter motorized users going both directions, as they do on non-loop trails. Loop trails also offer trail users a more desirable recreational experience. Agencies are encouraged to provide opportunity for "motorized loop trail systems" to lessen impacts and to provide a better recreational experience. Spurs are useful for exploration and reaching destinations.

309 19. Agencies are encouraged to allow use of specific roads for OHVs that are not licensed for the street use in order to develop a network of roads that tie OHV trails together.

310 20. Agencies are encouraged to utilize standardized trail signing and marking in order to lessen confusion. Trails closed unless otherwise marked open are not reasonable. Trails, when closed, should be signed with an official, legitimate reason. Monitoring should be implemented to justify the reasons stated.

311 21. Agencies are encouraged to utilize all trail maintenance and upgrading management techniques, such as, bridging, puncheon, realignment, drains, and dips to prevent closure or loss of motorized trail use. Trails should not be closed because of a problem with a bad section of trail. The solution is to fix the problem area or reroute the trail, not to close it. If funding or manpower is a problem, then other resources should be looked to including local volunteer groups, state or national OHV funding.

312 22. Agencies are encouraged to develop OHV programs that address more than law enforcement needs. OHV programs should actively promote the development, enhancement, and mitigation of OHV recreation opportunities.

313 23. Agencies are encouraged to develop and use State Trail Ranger Programs similar to Idaho's program through the State OHV Fund, as well as volunteer trail maintenance programs.

314 24. Agencies are encouraged to clear trails early in the year to insure maximum availability and reduction of diversion damage caused by routing around obstacles.

25.

315 26. Agencies are encouraged to avoid yearlong trail closures if wildlife concerns are valid only during certain seasons. In these instances, closures should be seasonal only with the dates consistent with the requirements to protect wildlife.

316 27. Agencies are encouraged to avoid trail closures associated with other actions including timber sales, mining, and livestock grazing. Corrective action should be taken where trail closures in the past have resulted from these sorts of past actions. Loss of motorized trails because of past timber sales should be mitigated by connecting old and new travelways to create looped trail systems.

317 28. Agencies are encouraged to re-establish and/or relocate all trails and roads disturbed by other actions such as timber harvest, mining, and livestock grazing.

318 29. Agencies are encouraged to seek outside review and input by OHV recreationists on all proposed management decisions affecting motorized recreation opportunities including closures.

319 30. Agencies are encouraged to establish greater credibility with motorized recreationists by having motorized recreation planners on the interdisciplinary team and a board of motorized recreationists.

320 31. Agencies are encouraged to align non-motorized area boundaries so that they do not encroach or eliminate trails located at the edge of the boundaries.

321 32. Agencies are encouraged to provide for motorized trails and vista points on the boundaries outside of the non-motorized areas so the motorized visitors can view those areas.

O3 (Cont.)

322 33. Agencies are encouraged to establish OHV census collection points at road and trail collection points. Include an OHV category on all trail and road census sheets.

323 34. Agencies are encouraged to treat hiking, horses and mountain bikes as a form of transportation, just as motorized recreation is a form of transportation.

324 35. Agencies are encouraged to correct the signing at trailheads that suggests that motorized visitors are more damaging than other visitors.

325 36. Agencies are encouraged to keep trails in proposed non-motorized/wilderness/roadless areas open. Motorized-use on trails in these areas does not detract from the wild characteristics in the proposed non-motorized/wilderness area. Additionally, the Roadless Rule specifically allows for OHV activity in Roadless areas.

326 37. Agencies are encouraged to provide good statistics on the level of use by the various public land visitors and use these statistics in the decision processes.

327 38. Agencies are encouraged to avoid the closure of trails to motorized use as the "easy way out" in dealing with issues created by non-motorized users.

328 39. Agencies should recognize that many roads and trails were not originally laid out with recreation in mind and that changes should be made in some road and trail segments to address environmental and safety problems. In most cases, problems can be mitigated to a reasonable level and closures can be avoided.

329 40. Agencies are encouraged to recognize, in the form of access, groups who expend effort and money in maintaining and improving roads and trails.

330 41. Agencies are encouraged to promote multiple-use and not exclusive-use. Exclusive-use is the antithesis of public access and recreational opportunities within public lands. Management for exclusive-use runs counter to Congressional directives for multiple-use.

331 42. Agencies are encouraged to make Travel Plan maps more readily available. Vending machines could be placed in areas that are accessible at any time of the day or week at BLM and FS offices.

332 43. Agencies are encouraged to publish all Travel Plan maps in the same format and in an easy to read format. The Travel Plan map and Visitors map should be the same. All visitors need to clearly understand what areas, roads or trails are open for motorized travel and what areas, trails, or roads are closed to motorized travel. Current maps lead to misunderstandings by both non-motorized and motorized visitors.

333 44. Agencies are encouraged to implement a standard signing convention that is easily understood. For example, there are often misunderstandings about seasonal motor vehicle restrictions due to the "No" symbol with the actual closure period shown below in small text that is often not seen or understood. In this example, the road or trail is open except during the period below but it is often misinterpreted as closed.

334 45. There needs to be better coordination between adjoining National Forest and BLM lands when making maps, laying out trails, and establishing travel plans. In some cases a trail is open in one jurisdiction but becomes closed when it crosses over the boundary to another jurisdiction resulting in an overall loss of motorized recreation opportunity.

335 46. Agencies should not use motorized access in areas closed to motorized access by the public because: (a) the public will see the tracks and could become upset that the motorized closure is being violated and/or (b) the public will see the tracks and conclude that motorized access is acceptable.

336 47. The difficulty of a particular route required can be identified by a signing system similar to ski runs so that recreationists are made aware of the skill levels required and so that a wide variety of routes for all skill levels can be enjoyed.

Responses

O3-306: Thank you for your comment.

O3-307: Please see responses O3-2, O3-45 and O3-111.

O3-308: Please see response O3-144.

O3-309: The proposed action stresses this at TM-D1.1.9.

O3-310: Thank you for your suggestion. Concerning volunteers and grants, see responses O3-215 and O3-261.

03-311:The Proposed Action does propose closing unneeded roads in travel management, wildlife, and special status species actions. However, closing all roads and trails containing weeds would mean prohibiting motorized access to most BLM public lands. See response O3-124.

O3-312: Thank you for your suggestion. Please see response O3-45.

O3-313: Thank you for your suggestion. Please see response O3-215 and O3-261.

O3-314: Thank you for your suggestion. Maintenance scheduling is an implementation action determined at the activity planning level.

O3-315: Thank you for your suggestion.

O3-316: The alternative travel management plans were developed from identified public recreational needs and necessary resource protection.

O3-317: Thank you for your suggestion. Designated routes disturbed by resource uses would be maintained.

O3-318: Thank you for your suggestion. Please see response O3-49.

O3-319: Thank you for your suggestion.

O3-320: Thank you for your comment.

O3-321: Thank you for your comment.

O3-322: Thank you for your suggestion. Please see response O3-129.

O3-323: Thank you for your suggestion. This is consistent with agency policy (H-1601-1, Land Use Planning Handbook, Appendix C). Designations required are proposed in the RMP Transportation and Travel Management section. Refer to Actions TM-D1.1.2 thru TM-D1.1.11.

O3-324: We are not aware of where such signs exist.

O3-325 Thank you for your suggestion. Please see response O3-7 and O3-75.

O3-326: Thank you for your suggestion.

O3-327: Thank you for your comment.

O3-328: Thank you for your comment.

O3-329: Thank you for your comment. BLM routinely recognizes volunteer efforts.

O3-330: Please see response O3-3.

O3-331: Thank you for your suggestion.

O3-332: Thank you for your comment. The proposed action emphasizes this at TM-D1.1.9.

O3-333: Thank you for your comment. The proposed action emphasizes this at TM-D1.1.9.

O3-334: Thank you for your suggestion. The proposed action emphasizes this at TM-D1.1.9. Also, see response O3-111.

(continued on the following page)

Responses
(Continued from Previous Page)

O3-335: Many of BLM's administrative uses are confined to the designated motorized routes. However, management actions also often require administrative travel on other routes. Such use is exempt from following the established travel restrictions (43 CFR 8340.0-5) Also refer to Actions TM-D1.1.4 and TM-D1.1.5.

O3-336: Thank you for your suggestion. This implementation level action can be considered during activity planning and is consistent with Action TM-D1.1.9.

Comments

O3 (Cont.)

337 48. Winter ATV riding has become very popular and winter ATV areas should be considered as part of the proposed action.

338 49. A new standard for motorized recreational trails could be developed that would be more beneficial for the environment and motorized recreationists. This new standard would be as non-linear as possible. The original system of roads and trails was constructed with the shortest distance from point A to point B in mind. The new standard for motorized recreational trails would not necessarily follow the shortest distance and would include many curves to keep the speed down. Advantages of this approach would include: routes could easily be moved to avoid cultural resources and sensitive environmental areas; less visible on the ground and from the air; aesthetically pleasing; lower speeds and greater safety; and greater enjoyment by motorized recreationists. These sorts of trails could be built as mitigation for any motorized closures required as part of an action. Please contact Doug Abelin for more information on the non-linear approach to trail construction.

Responses

O3-337: Thank you for your suggestion. Designated routes without seasonal restrictions if open to 4-wheeled vehicles would serve this need. Refer to Maps 37-40.

O3-338: Thank you for your suggestion. Planning and development of trail systems is an implementation level action. See responses O3-2, O3-45, paragraph 2 and O3-111.

O4

April 14, 2006

Eric Thomson
Coeur d'Alene Field Office, BLM
1808 N Third Street
Coeur d'Alene, ID 83814-3407

Sent Via Email to: ID_CDA_RMP@blm.gov

RE: Coeur d'Alene RMP

Dear Field Manager:

Enclosed are comments from Friends of the Clearwater, the Ecology Center, Allaince for the Wild Rockies, The Lands Council, and Selkirk Conservation Alliance on the Coeur d'Alene RMP DEIS. While this addresses the southern part of the Coeur d'Alene Field Office (FO)--the Grandmother Mountain roadless area and the Pinchot Butte (or Marshes) roadless area--in some detail, we also address issues that are broader in scope.

1. Range of Alternatives in Accordance with NEPA Requirements

The alternatives in the DEIS are misnamed and misleading. Almost every alternative is identical and the variance between them is minimal. (see table 2-1).

For example, the Grandmother Mountain WSA and roadless area (which includes Widow Mountain) is an important area for Moscow residents. However it is open to motor vehicles on trails under every single alternative. This is one of the few areas available for non-motorized recreation near Moscow and is heavily used by organizations and individuals. We provided scoping comments stressing this area must be closed to motor vehicles and have provided documentation of damage. (see section on travel management below).

A basic requirement of NEPA is that federal agencies must consider a reasonable range of alternative actions in an EIS. 42 U.S.C. 4332(2)(c)(iii); 40 C.F.R. 1502.14; Bob Marshall Alliance v. Hodel, 852 F.2d 1223 (9th Cir. 1988), cert. denied, 489 U.S. 1066 (1988). The range of alternatives should "sharply [define] the issues and [provide] a clear basis for choice among options by the decisionmaker and the public." Id. Under NEPA, alternatives analysis must:

> (a) Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated. ...
>
> (c) Include reasonable alternatives not within the jurisdiction of the lead agency.

40 C.F.R. ß 1502.14 (a), (c). See California v. Block, 690 F.2d 753, 765-69 (9th Cir. 1982) (reversing EIS for failure to address reasonable range of alternatives); see also Muckleshoot Indian Tribe v. USFS, 177 F.3d 800 (9th Cir. 1999) (reversing EIS for failure to address reasonable range of alternatives).

1 In the proposed RMP there is a lack of a range of alternatives--or any alternative--that suggests closing the most popular nonmotorized backcountry area in the region to motor vehicles.

O4-1: As indieated on page 1-7, roadless area inventories and wilderness suitability determinations are beyond the seope of the RMP. BLM's recommendations on Wilderness Study Areas were forwarded to the President in 1991. Those reeommendations were later forwarded to Congress, and eontinue to await Congressional aetion. We have been direeted by BLM Instruction Memorandum No. 2003-275 that "the BLM's authority to conduet wilderness reviews, ineluding the establishment of new WSAs, expired no later then Oetober 21, 1993, with the submission of the wilderness suitability reeommendations to Congress pursuant to Seetion 603 of the FLPMA" and also, "that the BLM is without authority to establish new WSAs." The three BLM wilderness study areas within the planning area were recommended non-suitable for wilderness designation. Elimination of allowed motorized uses to manage these non-suitable WSAs as if they were wilderness is ineonsistent with and eontrary to the reeommendations before Congress. Consequently, alternatives to make "elosed" vehiele designations were eonsidered but not earried forward. The document was modified to make this elear (see Chapter 2, Seetion 2.4.5).

Comments

O4 (Cont.)

The Seventh Circuit recently explained:

> No decision is more important than delimiting what these "reasonable alternatives" are. . . . One obvious way for an agency to slip past the strictures of NEPA is to contrive a purpose so slender as to define competing "reasonable alternatives" out of consideration (and even out of existence). . . . If the agency constricts the definition of the project's purpose and thereby excludes what truly are reasonable alternatives, the EIS cannot fulfill its role. Simmons, 120 F.3d at 660.

2

This RMP DEIS follows that pattern mentioned by the Court. In coming up with the purpose and need, the agency has defined the issues to preclude a reasonable array of alternatives.

2. Forest Vegetation/Fire/HRV

The RMP DEIS is based largely upon a flimsy premise that the forested areas, in particular, need massive and extensive human intervention to make them healthy again. The overriding theme seems to be the forests are out of whack because of fire suppression. Of course, the changes that have taken place from logging, mining and grazing are not emphasized.

3

The DEIS and associated documents are not precise in how to define forest health. Is it merely an expression of being within historical range of variability (HRV) or does it include human economic concerns as well? If the latter is the case, how can science define what is healthy since the economic values are simply that, expressions of a value system, and not based in value-neutral science? (see Walder 1995)

4

It becomes very difficult to subscribe to the DEIS arguments when the definitions are not precise.

The DEIS's apparent definition of HRV seems very narrow, without conclusive justification and focusing mainly on ponderosa pine types yet it would seem the DEIS maintains that the big fires of the early 1900s, natural events as far as we know, put this area outside the HRV. Thus, it would appear the HRV ought to be able to account for these events.

5

What range of time is being used to determine HRV and is it long enough to be accurate? What proof is there to refute scientific findings that forest conditions in 1850 or 1900 were only a few frames and not representative of an ecological perspective that should be from two to three thousand years in length (see Walder 1995 and Johnson et. al 1994)?

The steady-state theory of ecology is inappropriate for time scales more than 200 years in length. (Webb and Bartlein 1992) Certainly, the goal is to have BLM-managed public forests in perpetuity. A time frame of 200 years only takes us back to Lewis and Clark, a time not so distant when this area was considered part of the public domain of the USA by the federal government (though disputed with the British) just as it is today.

In the mid-1800s, the event known as the Little Ice Age was ending. It may be that climatic change allowed conditions for fires like those in the early 1900s to occur and become the major determinants of the landscape of today. It is also possible that fires like those in the past century occurred on more than one occasion since the retreat of the glaciers. Paleoecological research shows the importance of climate change in governing vegetation (Webb and Bartlein 1992).

O4 (Cont.)

Vegetation changes seem to lag behind climate change (Johnson et al. 1994). When looking at the bigger picture that takes into account climatic shifts, and not some narrow, snapshot-in-time view, the concept of a normal fire frequency may not be valid. (Walder 1995). Research being conducted by Jennifer Pierce and others on the Boise National Forest shows this to be the case. In that case, it appears big stand replacing events occurred in ponderosa pine forests between 900 and 1200 due to climatic conditions. (see Pierce et al. 2004)

Given climate change and the very real possibility that site potential for various types have changed (soil pH and chemistry, moisture, soil temperature) because of it, the view of HRV on anything less than a time scale that takes into account climate shifts may be inadequate. That is especially true given the dramatic and scientifically documented increases in global temperature over the past few years. The past decade was the warmest on record. Again, the DEIS does not define the HRV so it is impossible to assess the assumptions behind the HRV.

Questions need to be asked about the effects of climate change, logging, and fire suppression in this area. It is possible that all have irrevocably altered site potential.

For example, Tiedemann et. al. (2000) challenge the use of "historic range of conditions" and call into question the whole notion that we can, or even should, try to replicate such conditions by stating:

> "Nearly 100 years of fire exclusion, possible climate changes, and past management practices may have caused these communities to cross thresholds and to reside now in different steady states."

It may be impossible to differentiate between the roles played by climate change and fire suppression. Some research suggests that the effects of both may be similar.

Any forest condition that is maintained through intense mechanical manipulation is not maintaining ecosystem function. We request site-specific disclosure of the historical data used to arrive at any assumption of "desired conditions." We do not believe the proposed management activities are designed to foster the *processes* that naturally shaped the ecosystem and resulted in a range of natural structural conditions, they are merely designed to recreate what the agency believes were structural *conditions in a single point* in time that the FS considers "natural." Generally, past process regimes are better understood than past forest structure. How are you factoring in fire, insects, tree diseases, and other natural disturbances in specifying the structural conditions you assume to be representative of the historic range?

6

In attempting to replicate some as yet to be defined HRV, the DEIS adopts a strategy nearly identical to the logging of the past which resulted in forest fragmentation and the conditions of today. It rejects natural fire as a component of the landscape and offers no way for the BLM to cooperate with the Forest Service on natural fire plans. For example, the Grandmother Mountain area, remote as it is, is a good place to allow natural fire to play its role in the ecosystem.

7

The irony is this: BLM in the RMP DEIS blames fire suppression as the reason for vegetation change yet wants to continue along that same fire suppression path. While the agency may need to be careful in areas immediately adjacent to structures (see Cohen 1999), some of the more remote areas, like Grandmother Mountain mentioned above, can allow natural processes to shape their character. BLM has completely rejected this alternative.

Responses

O4-2: The purpose and need for the RMP in no way impinges on the BLM's ability to develop a full range of alternatives. In contrast to your suggestion, the planning issues promote consideration of a full range of alternatives, especially when considering options for managing motorized and non-motorized recreation (see Issue 1 in Section 1.4.2). However, BLM has reconsidered the potential to broaden the range of alternatives in regard to management direction for motorized use in the Grandmother Mountain WSA. See Section 2.4.6: Alternatives Considered, but Not Analyzed in Detail.

O4-3: Research does indicate that logging, roads, and other human disturbances can promote the spread of diseases and insect infestations (ICBEMP 2000). ICBEMP also concludes that the exclusion of fire combined with the harvesting of shade intolerant trees has resulted in a shift of forest dominance to smaller shade tolerant trees that are more susceptible to insects, disease, stress, and wildfire.

O4-4: See definition for "Forest Health" added to the Glossary.

O4-5: See definition for HRV added to the Glossary.

HRV was determined from the IPNF AMS and the ICBEMP science finding, both of which have scientific research supporting their conclusions. Walder 1995 includes many discussions of vegetation conditions for the last 10,000 years and tries to explain HRV in terms of "evolutionary time". This information is irrelevant to the timeframe the CDFO RMP uses for "pre-settlement" conditions.

The conclusion of the Johnson et al. 1994 paper is that "large-fire years" defined by the total acres burned is related to weather systems and their effects on drying of forest fuels over large areas. The article mentions that there was a large-scale shift in fire frequencies in the mid-1700, related to climate change associated with the Little Ice Age. There is no mention of HRV. The article would appear to support the concept that 1850 or 1900 would be a better representation of historic conditions than those of 2000-3000 years ago given the Little Ice Age climate change.

O4-6: HRV was determined from the IPNF AMS and the ICBEMP science finding (see definition in Glossary), both of which have scientific research supporting their conclusions. Both of these also use local information, and the ICEBMP uses regional information. Fire, insects, disease and other natural disturbances are considered in HRV. The alternatives presented would attempt to put the forest in a condition where the effects from natural disturbances are less damaging.

O4-7: The RMP is different than the MFP under which we are currently operating. The MFP places emphasis on meeting an allowable sale quantity. The RMP will place emphasis on returning the forest to historic species composition, structure, and function (see Goal VF-1). Removal of forest products will be a result of the treatment applications applied not the purpose for applying the treatment. Use of natural fire is not rejected and is, in fact, considered in Alternatives B, C, and D, based on ecological conditions, resources at risk and weather conditions. (see Objectives VF-B1.4, C1.4 and D1.4 and Objectives WF-B1.4, C1.4 and D1.4).

Comments

O4 (Cont.)

Regarding fire, Hutto (1995) states:

> Fire (and its aftermath) should be seen for what it is: a natural process that creates and maintains much of the variety and biological diversity of the Northern Rockies.

This statement, carefully considered, calls into question the whole BLM rationale for "managing" wildfire as is has historically "managed" it. Rather than trusting nature to right the wrongs perpetrated by past misguided BLM policies, the BLM now insists upon managing itself out of the supposed "unnatural" conditions created by its own mismanagement, a kind of administrative hubris specifically addressed by Hutto (1995):

> Fire is such an important creator of the ecological variety in Rocky Mountain landscapes that ***the conservation of biological diversity*** [a goal in the RMP and of FLPMA] ***is likely to be accomplished only through the conservation of fire as a process***...Efforts to meet legal mandates to maintain biodiversity should, therefore, be directed toward maintaining processes like fire, which create the variety of vegetative cover types upon which the great variety of wildlife species depend.
>
> Unfortunately, we are not currently managing the land to maintain the kind of early successional seral stages that follow stand-replacement fires and, hence, many fire-dependent plant and animal species. . . . Most of the forested landscape in the northern Rockies evolved under a regime of high-intensity, large fires every 50-100 years, **not under a regime of low-intensity, frequent understory burns.** (emphasis added)

8

That last point is crucial. BLM is trying to apply a model that does not fit the landscape. BLM further errs in suggesting that fire suppression has been effective for 100 years. That is completely inaccurate, the huge 1910 fires occurred 94 years ago. The huge fires in 1934 occurred a little over 70 years ago. Indeed, agency figures suggest fire suppression, in terms of acreage burned, did not become effective until about 1950.

The assumptions about vegetation, pre-1900s and fire frequency may be incongruous. In other words, it seems a bit of a stretch for the landscape and seral stages to be what they supposedly were pre-1900 under the fire regimes and other physical factors supposedly present in this area Stochastic modeling could give an idea if that is indeed the case.

The same kind of modeling could also give us an idea of the time frames it would take, under the various alternatives, for the FO area to regain the HRV the agency says the ecosystem previously operated within (again, that HRV would have to be defined). In other words, will the proposed treatments indeed emulate natural processes prevent stand-replacing fire when natural processes didn't do so in the early 1900s (long before massive logging or so-called fire suppression), the very events that created the stands of lodgepole that are quite prevalent in the area?

The fact that areas may have missed some fire cycles may not be important at all for a couple of reasons. First, is the predominance of lethal fire in the area like in 1910 which sets the successional stages at levels far different than those the agency claims are historic. This is true for ponderosa pine types as well in this area which tend to be a bit wetter than the more typical ponderosa pine types further south. Second, is the fact that these cycles are not hard and fast This second question is addressed briefly below.

9 Other models of fire regimes need to be considered. Some research suggests, even in the most studied ponderosa pine fire types that fire return intervals are far from certain and may be far different (if valid

O4 (Cont.)

9 at all) than previously believed. Baker and Ehle (2001) note in the abstract of their recent peer-reviewed paper note:

> "Present understanding of fire ecology in forests subject to surface fires is based on fire-scar evidence. We present theory and empirical results that suggest that fire-history data have uncertainties and biases when used to estimate the population mean fire interval (FI) or other parameters of the fire regime. First, the population mean FI is difficult to estimate precisely because of unrecorded fires and can only be shown to lie in a broad range. Second, the interval between tree origin and first fire scar estimates a real fire-free interval that warrants inclusion in mean-FI calculations. Finally, inadequate sampling and targeting of multiple-scarred trees and high scar densities bias mean FIs toward shorter intervals. In ponderosa pine (Pinus ponderosa Dougl. ex P. & C. Laws.) forests of the western United States, these uncertainties and biases suggest that reported mean FIs of 2–25 years significantly underestimate population mean FIs, which instead may be between 22 and 308 years. We suggest that uncertainty be explicitly stated in fire-history results by bracketing the range of possible population mean FIs. Research and improved methods may narrow the range, but there is no statistical or other method that can eliminate all uncertainty. Longer mean FIs in ponderosa pine forests suggest that (i) surface fire is still important, but less so in maintaining forest structure, and (ii) some dense patches of trees may have occurred in the pre-Euro-American landscape. Creation of low-density forest structure across all parts of ponderosa pine landscapes, particularly in valuable parks and reserves, is not supported by these results."

Given this research, the concept of HRV may not be valid. In fact, the agency needs to take a look at all the assumptions behind the HRV and compare them with the differences in the scientific literature.

The Baker and Ehle paper calls into question the use of fire scars in establishing mean fire intervals and suggests that previous reports based upon fire scars may be biased. Most research is based upon fire scars.

Regardless of whether Baker and Ehle are right, or those using fire scars to establish fire regimes are right, or none are right, or all have validity, the fact remains these scientists appear to have somewhat different view of ponderosa pine systems, or at least what we think we know about them. The same questions about fire scars need to be asked about other forest types as well. This should have been fully recognized and evaluated in the RMP DEIS.

What peer-reviewed scientific studies refute a plethora of scientific studies and papers, including studies by the your sister agency, the Forest Service, which note that most northern Rocky forests, including most of the types found in this analysis area are within healthy HRV? (see Turner and Romme 1994, Hutto 1995, Barrett et al. 1991, Weir et al. 1995, Ament 1997). What scientific evidence refutes the findings in Ament (1997) where he quotes from Hutto (1995), that, "the origin of most Rocky Mountain forest stands can be traced to stand-replacement fires" instead of "mild understory burns?" What evidence is there that refutes the plethora of studies, including the Forest Service's fire categories, that stand-replacement fire is normal for many forest types?

Many timber sales in the past few years in the interior West have claimed a need to return conditions to a "pre-settlement" status. We question the authenticity of this model and cite two references that seem to refute the idea that our forests were far more open. The John Lieberg reports from 1897-9, part of the US Geological Surveys of the 1890's indicate stand densities, species by type and size, and contain photographs and descriptions of forest reserves in North Idaho, including the Priest River, Bitterroot and

Responses

O4-8: The RMP is different than the MFP under which we are currently operating. The MFP places emphasis on meeting an allowable sale quantity. The RMP will place emphasis on returning the forest to historic species composition, structure, and function (see Goal VF-1).

BLM's fire management strategy is to use wildfire to achieve forest characteristics more representative of historical conditions (see Goal WF-1). At the same time, BLM must preserve and restore listed species habitat. Allowing nature to take its course is not a feasible option in all areas due to the diversity of resources in the CDAFO. Therefore, the fire management actions described in the alternatives have been developed to give BLM forestry staff the flexibility needed to respond to an altered landscape, evolving resource needs, and a changing regulatory environment.

BLM agrees that natural fire regimes are the goal and, where feasible, wants to use fire to achieve goals. The issue is complicated by landownership patterns, human habitation, current forest species composition, past management actions, and public sentiment.

The key to understanding the natural role of fire in the planning area is in realizing the intricacies and interaction of vegetation with soil, weather and geographic features that creates the unique situation that exists in the Panhandle of Northern Idaho. The Panhandle area cannot be compared directly with the standard model for the Northern Rockies which has a much dryer climate and much different fire regimes as supported by the FRCC definitions and mapping (Hann, Wendal, Havlina, Doug, Shlisky, Ayn et al. 2003). The Panhandle has a much stronger component of mosaic type fires with areas of high-intensity stand replacing fire mixed with areas of low-intensity underburns and islands of unburned areas. This mosaic pattern is primarily driven by fuel loads as they interact with weather to create the conditions of large fire spread (Turner and Romme 1994). To only look at "crown fire" spread, conditions and impacts is overlooking the often greater impacts to the soil and vegetation from high-intensity ground fires that are primarily driven by fuel load conditions.

O4-9: The alternatives and actions in the RMP are based on the best information available to BLM staff, as well as their institutional knowledge of on-the-ground conditions.

Comments

O4 (Cont.)

Coeur d'Alene areas. They clearly show high stem densities, many snags and burnt areas and few open stands. The Skovlin and Thomas report Interpreting Long-Term Trends in Blue Mountain Ecosystems from Repeat Photography, Pacific Northwest Research Station PNW GTR-315, June 1995, shows many photos from 60-80 years ago with stands that are very dense, as well as many stands that appear to he recently burned. In the case of both the USGS John Lieberg reports and the Blue Mountain report there is little evidence of the widely spaced forest that current BLM timber sales are trying to attain. We believe the bias toward logging has unduly influenced forest management and that an honest appraisal of stand succession, historic processes and desired future condition must be made.

The DEIS indicates that large stand-replacing fires are not desired. Yet, they were in the range of variability and the DEIS seeks to replay the lodgepole pine cycle.

The attempts at breaking up the landscape to prevent or reduce large, stand-replacing fires may be useless. If not, there is no real need to create anymore breaks in the landscape as any aerial photograph or satellite imagery will attest much has already occurred, especially in the Coeur d'Alene River drainage. In any case, Cohen (1999) suggests that to protect buildings and structures, anything beyond 100 meters is not efficient. His research suggests that for purposes of community structure protection, the WUI is only 100 meters or so wide.

10 The DEIS fails to analyze some important findings about logging and fire. Both the Sierra Nevada and Interior Columbia Basin Ecosystem Management Projects found that logging was a major reason for increased intensity and severity of wildland fire. Della Sala et al (1995 and 1995a) and Henjum et al.(1994) agree that scientific evidence does not support the hypothesis that logging, thinning, minimize the effects of fire.

11 That leads to another issue. Lodgepole pine (in fire groups three and four, see Smith and Fischer 1997) are in stand-replacing fire regimes (Cooper et al. 1991, Barrett 1982 and Green 1994 in Smith and Fischer 1997). Research from lodgepole pine in Yellowstone found stand-replacing or severe fires are a function of weather, not fuel load (Turner et al. 1994). This contradicts the main assumption in the DEIS based upon forest structure and VRUs.

12 The DEIS, in one of its schizophrenic incarnations, presents a version of history that is speculative, at best, given the information--the science is not definitive on historical conditions, though the DEIS pretends it is. The belief that small, cool fires shaped the landscape of North Idaho is not consistent with the data, especially the events on the early 1900s. The belief that fire suppression everywhere has led to hotter fires currently is not consistent with the burn intensity and severity of recent fires (see for example, the Beaver Lakes complex fire BAER report of 2003 from the adjacent Clearwater National Forest that showed the logged private lands burned much hotter than the unlogged national forest). Even if it were true fires are burning hotter now, there is considerable evidence it is because of climate change, not fuel amounts.

It is difficult to evaluate the impacts on vegetation because of the confusing array of habitat or vegetation typing. VRUs don't correlate well with other methods and don't fit in with the habitat types found in Forest Service literature on fire regimes (see Smith and Fischer 1997).

Some species of trees, native insects, and disease organisms are often described by the agency as "invasive" or somehow bad for the ecosystem. Such contentions that conditions are somehow "unnatural" runs counter to more enlightened thinking on such matters. For example, Harvey et al., 1994 state:

O4 (Cont.)

Although usually viewed as pests at the tree and stand scale, insects and disease organisms perform functions on a broader scale.

...Pests are a part of even the healthiest eastside ecosystems. Pest roles—such as the removal of poorly adapted individuals, accelerated decomposition, and reduced stand density—may be critical to rapid ecosystem adjustment

...In some areas of the eastside and Blue Mountain forests, at least, the ecosystem has been altered, setting the stage for high pest activity (Gast and others, 1991). This increased activity does not mean that the ecosystem is broken or dying; rather, it is demonstrating functionality, as programmed during its developmental (evolutionary) history.

13 The vegetation section seems to suggest logging as a way to reduce insect and disease damage to timber stands. As far as we are aware, the BLM has no empirical evidence to indicate its "treatments" for "forest health" decrease, rather than increase, the incidence of insects and diseases in the forest. Since the BLM doesn't cite research that proves otherwise in this RMP DEIS we can only conclude that "forest health" discussions are unscientific and biased toward logging as a "solution." Please consider the large body of research that indicates logging, roads, and other human caused disturbance promote the spread of tree diseases and insect infestation.

For example, multiple studies have shown that annosus root disease (Heterobasidion annosum, formerly named Fomes annosus), a fungal root pathogen that is often fatal or damaging for pine, fir, and hemlock in western forests, has increased in western forests as a result of logging (Smith 1989). And researchers have noted that the incidence of annosus root disease in true fir and ponderosa pine stands increased with the number of logging entries (Goheen and Goheen 1989). Large stumps served as infection foci for the stands, although significant mortality was not obvious until 10 to 15 years after logging (Id.).

The proportion of western hemlock trees infected by annosus root disease increased after precommercial thinning, due to infection of stumps and logging equipment wounds (Edmonds et al. 1989, Chavez, et al. 1980).

Armillaria, a primary, aggressive root pathogen of pines, true firs, and Douglas-fir in western interior forests, spreads into healthy stands from the stumps and roots of cut trees (Wargo and Shaw 1985). The fungus colonizes stumps and roots of cut trees, then spreads to adjacent healthy trees. Roots of large trees in particular can support the fungus for many years because they are moist and large enough for the fungus to survive, and disease centers can expand to several hectares in size, with greater than 25% of the trees affected in a stand (id.). Roth et al. (1980) also noted that Armillaria was present in stumps of old-growth ponderosa pine logged up to 35 years earlier, with the oldest stumps having the highest rate of infection.

Filip (1979) observed that mortality of saplings was significantly correlated to the number of Douglas-fir stumps infected with Armillaria mellea and laminated root rot (Phellinus weirii). McDonald, et al. (1987) concluded the pathogenic fungus Armillaria had a threefold higher occurrence on disturbed plots compared to pristine plots at high productivity sites in the Northern Rockies. Those authors also reviewed past studies on Armillaria, noting a clear link between management and the severity of Armillaria-caused disease.

Responses

O4-10: BLM agrees that the harvest of trees can cause the increased intensity of wildfire. Research has shown that harvesting of large shade intolerant trees resulted in a shift of forest dominance to smaller shade tolerant trees that are more susceptible to wildfire, stress, insects, and disease (Hann, Jones, Karl, et al. 1997 in ICBEMP 2000).

Research does indeed show that thinning can minimize the effects of fire. Thinning from below and possibly free thinning can most effectively alter fire behavior by reducing crown bulk density, increasing crown base height, and changing species composition to lighter crowned fire adapted species. Such intermediate treatments can reduce the severity and intensity of wildfires for a given set of physical and weather variables (Graham, Harvey, Jain, and Tonn 1999).

While it is reasonable to agree that fires will spread through managed forests, and that extreme weather conditions can overshadow benefits of fuel reduction, the evidence provided does not make the case that salvage, thinning and logging, when designed to reduce fuel hazards and implemented as planned, do not reduce the risk of unnaturally large or severe wildland fires.

Henjum et al. 1994 is a "Report to Congress" about old growth forest management in forests east of the Cascade crest in Washington and Oregon. In the summary of the report the statement is made "Many ecologists believe that the combined effects of logging old growth and fire prevention have significantly increased the vulnerability of Eastside landscapes to catastrophic disturbances..." The report states "Salvage (removing dead, fallen woody materials) and thinning (cutting small live trees) are two legitimate techniques – but not the only ones – for lowering risk from such disturbances.." (referring to drought, fire, insects, and pathogens). And states that "no consensus exists on silvicultural practices for minimizing effects...on the conditions under which LS/OG (late-successional/old growth) should be entered..." The report does *not* "agree that scientific evidence does not support the hypothesis that logging, thinning, minimize the effects of fire."

It is standard practice and knowledge in the wildland firefighting community that containment opportunities and efforts are generally far more successful and safer for both the public and firefighters in areas that have been managed in the past. When management activities include fuels treatments the result in lower FRCC ratings has the same affect on a "running " fire as previously burned areas. This is dramatically illustrated in the Moose Fire Progression maps from 2001. This fire in the course of making major runs of 15,000 plus acres split at the head and burned around both sides of an area that was burned in the 1980's (http://www.nps.gov/glac/resources/fires_2001/moose/index.htm).

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Responses
(Continued from Previous Page)

O4-11: We agree that weather does play a role in stand replacing or severe fires; however, research also suggests that wildfire behavior is influenced by physical setting (local to regional topography and terrain features), fuels (composition, structure, moisture content of dead and live vegetation and detritus). (Rothermel 1983, Chandler and others 1991, Debano and others 1998, Graham and others 1999 In Graham, McCaffrey and Jain, 2004).

The subject of Turner et al. 1994 is the relationship between crown fire and landscape pattern. You are correct about what this paper says about Yellowstone fire return intervals (200-400 years from Romme 1982 and Romme and Despain 1989). The paper also indicates that the fire return interval for "western Montana, northern Idaho (the CdA RMP Planning Area) is 90-150+ based on Arno 1980. The implication in the paper regarding the effect of weather on fire regime is specifically related to New Mexico, Arizona, and Colorado. The "research in Yellowstone" concerning altered fire regimes were attributed to a "non-equilibrium landscape". In the article, a landscape in equilibrium is one where "...distributions of stand age classes or successional stages that show little or no change over time." The paper does not discuss the condition of northern Idaho's lodgepole pine forest as being in equilibrium or not. A critical element to the understanding and use of information in this article is to remember that "crown fire" can not be directly translated to mean "high-intensity" or "stand-replacing". Stand-replacing fires are often low-intensity, and stand-replacing fires are not always crown fires.

The BLM forest and woodland vegetation management goal places emphasis on returning the forest to historic species composition, structure, and function (see Goal VF-1) using various treatment actions described in Objectives VF-B1.2, C1.2, & D1.2, Objectives VF-B1.3, C.1.3, D1.3, Objective VF-B1.4, C1.4, & D1.4., and Objectives WF-B1.4, C1.4, and D1.4. At the same time, BLM must preserve and restore listed species habitat. Allowing nature to take its course is not a feasible option in all areas due to the diversity of resources in the planning area. Using the treatment applications described in the alternatives for Forest Woodland vegetation and/or Wildland Fire Use gives BLM forestry and fuels staff the flexibility needed to respond to an altered landscape, evolving resource needs, and a changing regulatory environment.

O4-12: The HRV was determined from the IPNF AMS and the ICBEMP science finding both of which have scientific research supporting their conclusions. Both of these also use local information, and the ICEBMP uses regional information. The information presented in Section 3.2.8 (Wildland Fire Ecology and Management) uses information provided by GAP, ICBEMP, BLM, and USFS.

Table 3-17 shows that the Dry Conifer comprises approximately 35% of the three major forest woodland vegetation types and is in a Fire Regime Class I which generally has low severity fires (small cool fires). The Wet/Cold and Wet/Warm comprise approximately the remaining 65% of the three major forest woodland vegetation types and are in Fire Regime Class IV and V which have stand replacement severity fires. From GAP analysis, Table 3-17 also shows that the Dry Conifer vegetation is in a Fire Regime Condition Class 3 and the Wet/Warm and Wet/Cold Conifer types are in a Fire Regime Condition Class 2. None are in Fire Regime Condition Class I but instead are considered to be unhealthy, non-functioning, and at risk for losing key ecosystem components.

As noted in Section 3.2.8, fire suppression efforts and resource management activities have influenced the structure and composition of these forest woodland vegetation types. Table 3-14 shows that between 1974 and 1992 there has been substantial increases in number of live trees per acre, suppressed trees per acre (which comprise fuel ladders), trees infected with disease and insects, and number of dead trees per acre. ICBEMP shows that continuing current management would lead to a decline in ecological integrity. The function and process of the ecological process has changed. The risk and severity of fire continues to grow. Whereas lethal fires played a lesser role in the past on the landscape, lethal fires now exceed non-lethal fires.

BLM agrees that weather does play a role in stand replacing or severe fires especially with drought conditions that have persisted; however, research suggests that there is still uncertainty to impacts from global warming. Research also suggests that wildfire behavior is influenced by physical setting (local to regional topography and terrain features) and fuels (composition, structure, moisture content of dead and live vegetation and detritus) (Rothermel 1983, Chandler and others 1991, Debano and others 1998, Graham and others 1999 In Graham, McCaffrey and Jain, 2004).

The BAER report provides estimates of burn severity on National Forest and Plum Creek Timber Company. The report indicates that Plum Creek lands had a higher percentage of moderate and high burn severity than the National Forest. The report writers attribute the outcome to "the presence of red logging slash on portions of their [Plum Creek] land. The report goes on to say that "Slope, aspect, fuel loadings, and the type of vegetative cover present when the fire burned influenced the severity of the burn." The report does not address fire suppression effect on fire severity. The report also does not indicate whether National Forest lands were logged.

O4-13: BLM agrees with your statement that research does indicate that logging, roads, and other human disturbances can promote the spread of diseases and insect infestations (ICBEMP 2000). Logging does not equal land treatment actions as you seem to indicate. Rather, logging may be part of the land treatment action to recover commercial forest products (e.g. new wood, sawlogs, hog fuel, etc.) Under Alternatives B, C, & D, BLM has chosen a variety of silvicultural treatments including thinning and prescribed fire to reduce insect and disease damage to timber stands.

Treatments would be designed to reduce the number of trees that are susceptible to insect and disease mortality. Also, stress from overstocking and drought is a known contributor to insect and disease mortality, and reducing stand density has been shown to reduce stress from nutrient and water competition. As an example, research has shown that thinning overly dense forests before rather than after an outbreak has started is one of the best methods of reducing infestation and preventing mortality caused by bark beetles on residual trees (Sartwell and Stevens 1975, Cole and Cahill 1976, McDowell et al 2003).

Comments

O4 (Cont.)

Morrison and Mallett (1996) observed that infection and mortality from the root disease Armillaria ostoyae was several times higher in forest stands with logging disturhance than in undisturhed stands, and that adjacent residual trees as well as new regeneration became infected when their roots came into contact with roots from infected stumps.

Pre-commercial thinning and soil disturbance led to an increased risk of infection and mortality by hlack-stain root disease (Leptographium wageneri) in Douglas-fir, with the majority of infection centers being close to roads and skid trails (Hansen et al. 1988). Also another Black-stain root disease (Verticicladiella wagenerii) occurred at a greater frequency in Douglas-fir trees close to roads than in trees located 25 m or more from roads (Hansen 1978). Witcosky et al. (1986) also noted that precommercially thinned stands attracted a greater numher of black-stain root disease insect vectors.

Complex interactions involve mechanical damage from logging, infestation by root diseases, and attacks by insects. Aho et al. (1987) saw that mechanical wounding of grand fir and white fir by logging equipment activated dormant decay fungi, including the Indian paint fungus (Echinodontium tinctorium).

Trees stressed by logging, and therefore more susceptible to root diseases are, in turn, more susceptible to attack by insects. Goheen and Hansen (1993) reviewed the association between pathogenic fungi and bark beetles in coniferous forests, noting that root disease fungi predispose some conifer species to bark beetle attack and/or help maintain endemic populations of bark beetles.

Goheen and Hansen (1993) observed that live trees infected with Laminated root rot (Phellinus weirii) have a greater likelihood of attack by Douglas-fir beetles (Dendroctonus pseudotsugae). Also, Douglas-fir trees weakened by Black-stain root disease (Leptographium wageneri var. pseudotsugae) are attacked and killed by a variety of bark beetle species, including the Douglas-fir bark beetle (D. pseudotsugae) and the Douglas-fir engraver (Scolytus unispinosis) (id.).

The root disease Leptographium wageneri var. ponderosum predisposes ponderosa pine to several bark beetle species, including the mountain pine beetle (D. ponderosae) and the western pine beetle (D. brevicomis) (Goheen and Hansen 1993).

A variety of root diseases, including black-stain, Armillaria, and brown cubical butt rot (Phaeolus schweinitzii), predispose lodgepole pine to attack by mountain pine beetles in the interior west. The diseases are also believed to provide stressed host trees that help maintain endemic populations of mountain pine beetle or trigger population increases at the start of an outbreak (Goheen and Hansen 1993).

Grand and white fir trees in interior mixed-conifer forests have been found to have a high likelihood of attack by the fir engraver (Scolytus ventralis) when they are infected by root diseases, such as laminated root rot, Armillaria, and annosus (Goheen and Hansen 1993).

More western pine beetles (Dendroctonus breviformis) and mountain pine beetles (D. ponderosae) were captured on trees infected by black-stain root disease (Ceratocystis wageneri) than on uninfected trees (Goheen et al. 1985). The two species of beetle were more frequently attracted to wounds on trees that were also diseased than to uninfected trees. They also noted that the red turpentine beetle (Dendroctonus valens) attacked trees at wounds, with attack rates seven-to-eight times higher on trees

O4 (Cont.)

infected with black-stain root disease than uninfected trees. Spondylis upiformis attacked only wounded trees, not unwounded trees (Id.).

14 Specific to the Grandmother Mountain/Pinchot Butte Area, it makes no sense to allow logging in or around Pinchot Marshes or Marks Butte/Freezeout Ridge (see maps 9 to 12). The former is an important area that should be an ACEC and a WSA, especially the eastern half of the BLM-administered portion of public land south of the Freezeout Saddle road. The western half of that parcel is very steep and not conducive to logging.

15 Marks Butte is part of the Grandmother Mountain roadless area. In the forest plan revision, the USFS is preliminary recommending that the area not be subject to logging.

3. Minerals

16 None of the alternatives propose a no-leasing option for any sensitive areas. Rather, BLM proposed a no surface-occupancy lease. However, lease stipulations do not always hold. NSO stipulations can be chanced and amended. At a very minimum, one alternative that closed off sensitive areas like Grandmother Mountain and Pinchot Butte WSA/roadless areas to leasing should have been considered.

17 Similarly, few areas are proposed to be segregated or withdrawn from mineral entry. Given the ecological importance, wildness, and recreation values of areas like Grandmother Mountain and Pinchot Butte areas, this entire high elevation area should be closed to mineral entry.

4. Travel Planning

18 The RMP DEIS offers no alternative for non-motorized users. Almost all trails are open to this use. No alternatives look at closing routes that have significant resource damage or user conflict (see attached photo of damaging and illegal use in the Grandmother Mountain WSA. One is a pioneered route by motorcycles off of Widow Mountain, over a snowbank, and down off-trail. Others show damage and illegal trail rerouting from motorized users who avoid even small downed logs by driving around them. This violates both NEPA and the Executive Orders on ORV use.

19 There should be an alternative that closes The Delaney Creek trail, the one over Lookout Mountain, and the ones up to Lost Lake, Little Lost Lake and Fish Lake Creek (the Little North Fork).

20 Furthermore, the completely open nature of the Pinchot Butte and the Marks Butte/Freezeout area to snowmobiles is a serious problem. This is perhaps the best if not the only wolverine and lynx habitat on BLM-managed public land. The Freezeout Area is also popular for cross-country skiers. All of the Grandmother Mountain WSA and roadless area (including Marks Butte) and all of the Pinchot Butte are should be closed to snowmohiles.

21 Citizens have had an ongoing dialogue with officials of hoth agencies over the vehicle prohlem in the Grandmother Mountain area. Recently, Palouse Group Sierra Club and Friends of the Clearwater sponsored a meeting with the St. Joe District Ranger to discuss the ORV problem. Forty or Fifty people attended and were very concerned ahout the use of vehicles in this potential wilderness. Some cooperative venture needs to be undertaken between BLM and the USFS on vehicle management in this area.

Responses

O4-14: Timber management actions in steep, mountainous areas would utilize cable systems and helicopter logging.

O4-15: The BLM parcel to the north and east of Marks Butte is part of the Widow Mountain Special Recreation Management Area under Alternatives C and D. As such, the parcel will be intensively managed to retain the semi-primitive recreational setting. Thus, any vegetation treatment must comply with this objective. This parcel (except for Forest Road 301) will also be designated as a right-or-way avoidance area under Alternative D, due to the semi-primitive setting and its adjacency to a Forest Service Inventoried Roadless Area that will be managed as backcountry under the Proposed Revised IPNF Forest Plan (FS - 2006).

O4-16: This RMP is intended not to propose actions specific to any particular project, but to propose and evaluate actions that encompass the range of possible projects that plan is intended to be flexible and provide a framework for a range of project-specific options. The leasing of minerals on public lands is a discretionary act and thus the BLM will determine prior to issuing any exploration license if an area needs special protection, hence the NSOs and CSUs developed during the RMP process. Areas designated as a WSA are closed to leasing (H-8550-1, Interim Management Policy for Lands Under Wilderness Review) until Congress makes a determination on its status. If an area achieves Wilderness status then it remains withdrawn from the leasing laws. If Congress does not designate the area as Wilderness then the RMP recommends specific management prescriptions for each of these areas. In the case of Grandmother Mountain and Crystal Lake WSAs, NSO 1 and CSU 1 will be applied. It is true that these stipulations can be excepted or waived but that is a determination made at the project level. Pinchot Butte is not part of the BLM land base and therefore outside the scope of this RMP.

O4-17: The fact that a specific action is not mentioned in the RMP does not preclude it from happening. If Congress designates the Grandmother Mountain WSA as Wilderness it will be withdrawn from mineral entry, leasing, and sale. The RMP's focus is to prescribe management direction to ensure the area retains its wilderness values until Congress determines its status (H-8550-1, Interim Management Policy for Lands Under Wilderness Review). If Congress does not designate the area as Wilderness, then the RMP provides management direction that will protect identified special status species and unique environments while balancing BLM's mission of multiple use of the public lands. Pinchot Butte is not part of the BLM land base and therefore outside the scope of this RMP.

O4-18: Thank you for your suggestion. See response P1-1, paragraphs 2 and 3 and O5-24.

O4-19: Thank you for your suggestion. See response O4-1.

O4-20: Impacts to the lynx have been reviewed during formal consultation with the USFWS, and specific conservation measures from the Northern Rockies Lynx Amendment Biological Assessment have been incorporated into the RMP. Action TM-D1.1.3 restricts snowmobile use around wolverine den sites. The Grandmother Mountain Wilderness Study Area is also closed to snowmobile use by Action TM-D1.1.3.

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Responses
(Continued from Previous Page)

O4-21: Thank you for your suggestion. BLM has identified this as an issue and recognizes the need for collaboration. Refer to Actions TM-D1.1.9 and RC-D1.8.3.

Comments

O4 (Cont.)

5. Wildlife

The RMP DEIS does a poor job in protecting wildlife. A couple of examples illustrate this point.

22 First, the elk guidelines do not include the complete recommendations. There is no enforceable standard to keep specific miles of road or motorized trail per square mile of land or a similar habitat effective measure for various areas. Simply put, the elk habitat guidelines are meaningless without a clear requirement that roads and motorized trails must be kept within specific spatial constraints.

23 The RMP DEIS offers little protection for sensitive and listed wildlife species like lynx, wolverine, fisher and cavity nesters. In the case of lynx and wolverine, two species that are negatively affected by snowmobiles (see LCAS and Ruggerio et al. 1994. USDA Forest Service GTR RM-254 and updates), only alternative C provides protection from snowmobiles (2-60). The other alternatives provide protection around "known" denning sites, but that is hard to determine in the middle of the winter so it is a meaningless standard. Even alternative C has problems as it invites snowmobile use on high-elevation roads (for example Freezeout Saddle) without adequate enforcement.

24 Snag standards are inadequate in alternatives A and B. The other alternatives provide for more snags but emerging science suggests that even the higher numbers may not be adequate.

25 Similarly, old growth needs to be set aside and protected. The plan does not provide for a comprehensive way to do this.

6. Water Quality/Fish Habitat

The adoption of the CNFISH rather than INFISH is a mixed bag. The new standards improve slightly on INFISH in certain aspects, but in crucial aspects, the CNFISH standards are weaker than the existing INFISH standards.

26 Regarding RHCAs or RCAs, the standards should require that, at a minimum, default buffers be adopted. In instances where larger buffers are justified (and there are places they need to be implemented) then those should apply.

27 In roads management, the CNFISH is much weaker than current INFISH. Current INFISH standards require that RMOs be met, in CNFISH it only requires BLM "to strive to meet" the RMOs. Also INFISH requires avoidance of hydrological flow paths, CNFISH is much weaker in that regard.

28 The standards in CNFISH that refer to "expected, near natural period of restoration" further weaken requirements of meeting RMOs. These should be eliminated.

CNFISH is not the necessary replacement for INFISH in that both are quite similar. The BLM can't meet the requirements of bull trout by continuing with a program essentially the same as the one that was intended to be only a temporary, stop-gap measure.

We conclude this section of the comment letter with this passage from Frissell and Bayles (1996):

> Most philosophies and approaches for ecosystem management put forward to date are limited (perhaps doomed) by a failure to acknowledge and rationally address the overriding problems of uncertainty and ignorance about the mechanisms by which

O4 (Cont.)

> complex ecosystems respond to human actions. They lack humility and historical perspective about science and about our past failures in management. They still implicitly subscribe to the scientifically discredited illusion that humans are fully in control of an ecosystemic machine and can foresee and manipulate all the possible consequences of particular actions while deliberately altering the ecosystem to produce only predictable, optimized and socially desirable outputs. Moreover, despite our well-demonstrated inability to prescribe and forge institutional arrangements capable of successfully implementing the principles and practice of integrated ecosystem management over a sustained time frame an at sufficiently large spatial scales, would-be ecosystem managers have neglected to acknowledge and critically analyze past institutional and policy failures. They say we need ecosystem management because public opinion has changed, neglecting the obvious point that public opinion has been shaped by the glowing promises of past managers and by their clear and spectacular failure to deliver on such promises.

7. Weed Control

29 The RMP DEIS does little to help the spread of noxious weeds. Spraying herbicides and importation of exotic weed pests (bio-control) are Band-Aids that have their own problems. Prevention is the best tool for weed spread and the DEIS does not adequately address this issue. For example the following measures could be considered:

30 1- In conjunction with the USFS, require an inspection of all vehicles before entering BLM-administered public lands.

31 2- Prohibit livestock and packstock grazing and/or use in areas that currently contain weeds until the weeds are eliminated. Stock grazing on weeds along trails or in meadows carry and deposit those weed seeds into other places. Even if livestock are free of weeds when entering public lands, they can still spread weeds if allowed to graze in areas that contain weeds.

32 3- Prohibit ORVs from trails that contain weeds and close all backcountry trails to ORV use. Travel planning is essential in helping to prevent weed spread. Vehicles are the vectors that have spread weeds seeds throughout the North Idaho. Closing the WSAs and areas contiguous to national Forest roadless areas to vehicles, closing unneeded roads, and requiring vehicle inspection are all potential measures.

33 4- Close all roads that have weeds until weeds are eliminated, perhaps on a rotating basis. While this measure may not be popular, if the agency is truly committed to weed eradication, this should be considered.

34 5- Close all administrative sites, campgrounds (formal and informal) unless and until they are certified as weed free.

35 6- Quarantine all animals for at least 48 hours prior to entering backcountry trails. Having a quarantine corral established at all stock trailheads and have the trailheads staffed (especially during hunting season) and stocked with pelletized feed (weed-free hay isn't, people would be required to either bring in pelletized feed for the quarantine or purchase it from the campground host at the trailhead) is a start.

Responses

O4-22: The 22 recommendations in Appendix I do not include two related to livestock grazing because of the Preferred Alternative D would reduce livestock grazing from 4,004 to 1,218 acres. Action FW-C2.1.5 would reduce or maintain open permanent road densities to one mile of road per square mile of land outside of urban or rural areas. Action FW-C2.1.4 would close and partially obliterate all newly constructed roads upon completion of their need and purpose. These actions are repeated for the conservation of Canada lynx [SS-D1.1.6 Transportation 1(c)] and wolverine (SS-D2.4.4 and SS-D2.4.5).

O4-23: The objective and actions for lynx under the Proposed Action (Alternative D) for this Proposed RMP/Final EIS comes from the Preferred Alternative (Alternative F) from the Draft EIS for the Northern Rockies Lynx Amendment (Forest Service 2004). The Forest Service submitted a Biological Assessment to the FWS for consultation regarding the Lynx Amendment. The BLM submitted a BA to the FWS for consultation regarding this RMP/EIS.

Much of the suspected wolverine denning habitat on BLM public lands lies within the Crystal Lake WSA. Additional suspected denning habitat lies within the Roche Divide ACEC (Alternative C). The BLM has and will continue to coordinate inventories with the Idaho Fish and Game, as funding allows.

Actions SS-D2.2.1 and SS-D2.3.1 would implement actions under FW-D2.2, which would retain habitats for cavity nesters and fisher.

O4-24: The snag standard for Alternative A comes from the existing land use plan. Numbers of trees and snags for retention in alternatives C and D come from the Interior Columbia Basin Supplemental Draft EIS (2000). This is the latest pertinent science BLM is aware of.

O4-25: Vegetation treatments in the vicinity of old growth stands would follow direction in the Vegetation -Forests and Woodlands Action VF-B1.2.6, VF-C1.2.6, or VF D1.2.7. Also, a unique old growth stand is protected under Alternatives C and D with the designation of the Farnham Forest RNA/ACEC.

O4-26: Default buffers are provided under both INFISH and CNFISH. Please see "RHCAs/RCAs" section of Appendix D.

O4-27: CNFISH was designed to give BLM managers flexibility in applying INFISH measures. BLM's intent is to attain the same or greater level of RMO attainment under CNFISH as would have been realized under INFISH, but using a wider array of possible methods of doing so. Some of the road Standards and Guidelines in CNFISH are actually stronger than INFISH. For example, RF-2a in CNFISH requires analysis prior to construction of roads and landings in all RCAs, while INFISH only requires this in priority watersheds. In RF-2b INFISH guidance is to minimize roads and landings in RHCAs, while CNFISH guidance is to close existing roads and avoid construction of new roads and landings in RCAs.

(continued on the following page)

Responses
(Continued from Previous Page)

O4-28: Where the RMOs are not being met, the amount of recovery time to achieve the RMOs can be highly variable depending on the RMO, the particular aquatic system, influences from other landowners, climate, etc. It would be inaccurate to place generic timelines on RMO achievement, however if no timelines are specified, attainment of RMOs could be delayed.

Specifying that the RMOs are met within the "expected, near natural period of restoration", and requiring that this period is defined by an aquatic, soils or riparian specialist, ensures that recovery is not being delayed or prevented.

O4-29: BLM feels that a regional approach to weed control combined with prevention of the types of disturbance that commonly promote weed infestations is the best option. By continuing BLM's participation in CWMAs, eliminating cross-country OHV travel, implementing BMPs to minimize and mitigate for ground-disturbing activities, reducing vectors for weed seed transport, and closing unnecessary roads, BLM is actively addressing the problem of invasive species in the CDAFO. These BLM prevention measures, along with education efforts designed to inform the public of weed prevention issues, will help reduce the spread of noxious weeds on BLM lands. BLM does feel that prevention is a vital part of any successful weed management strategy.

O4-30: Please see response O4-29.

O4-31: Thank you for your comment. Although this may not be added to the alternatives for the RMP, BLM periodically updates its weed management plan and will consider all such suggestions.

O4-32: The Proposed Action does propose closing unneeded roads in travel management, wildlife, and special status species actions. However, closing all roads and trails containing weeds would mean prohibiting motorized access to most BLM public lands. Also, see the response to comment #1 regarding closing of WSAs to motorized vehicles.

O4-33: Most or all roads in the CFO have weeds of some sort. All such sites are subject to weed control measures designed to contain their spread and eliminate new occurrences.

O4-34: Most or all recreational and administrative sites have weed populations to a certain degree. All such sites are subject to weed control measures designed to contain their spread and eliminate new occurrences.

O4-35: The BLM Idaho State Office is currently proposing action that will require the use of certified weed-free hay, straw, and mulch on BLM-administered public land in Idaho. This proposed action would require all visitors, permittees, and operators to use certified weed-free hay, straw, and mulch when visiting or conducting authorized activities on BLM-administered public land in Idaho. This measure is needed to prevent and slow the continued spread of noxious and invasive weeds on public land. This policy is similar to the U.S. Forest Service weed-free hay order and will provide consistency for users of both BLM public land and National Forest land in Idaho.

Comments

O4 (Cont.)

36 | 7- Require pelletized feed. There is a great deal of douht that all certified feed is in fact weed free. Pellets are a simple and proven-effective remedy. Individuals visiting the national forests should be responsible to change the diet of their stock gradually to pelletized feed.

37 | 8- Where possible, consider establishing a mandatory permit system for visitors. This way, visitor use can be better monitored a problems avoided.

8. Wilderness Study Area/Special Management Areas/Wild and Scenic Rivers

38 | The RMP fails to even consider section 202 of FLPMA in evaluating wilderness potential of areas missed during the wilderness review. Only Congress, not the Secretary of Interior, has the constitutional power to exempt BLM from the requirements of FLPMA. The failure of BLM to analyze additional wilderness under section 202 is a fatal flaw. This is particularly important for the Pinchot Butte area that contains the unique Pinchot Marshes and is contiguous to a roadless area on the IPNF.

39 | The ACEC for the Little North Fork/Lund Creek should be expanded to include all of the public land in the Pinchot Creek hydrological drainage.

40 | All the rivers must be considered suitable for wild river status. BLM needs to change the incongruity between the wild river recommendations and the fact that motor vehicles are allowed on trails next to those segments (Little Lost Lake Creek, Lost Lake Creek and Fish Lake Creek/Little North Fork rivers).

9. Public Land Management

41 | Working with the Forest Service to consolidate land may be more efficient. Given that BLM manages less than 100,000 acres in all of this FO, most of which is contiguous to the Idaho Panhandle national Forest (at 2.5 million acres), it may make sense to reach an agreement with the USFS to manage those areas. Furthermore, if BLM is either unwilling or incapable of controlling motorized use in and
42 | around Grandmother Mountain WSA, then a land transfer to the US Forest Service should be considered. This would improve management efficiency and consolidate this area of public land.

We thank you in advance for giving serious and thoughtful consideration to our comments.

Sincerely,

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O4 (Cont.)

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Table of References

Responses

O4-36: Please see response O4-35.

O4-37: Site specific recreation management actions are analyzed, evaluated, and determined at the activity planning level which follows Special Recreation Management Area designations made in the RMP. Some of the RMP proposed actions do describe a "framework" for the activity planning that will follow. For recreation management actions relating to the Grandmother Mountain WSA refer to Actions RC-D1.8.2-5. (Reference H-1601-1 Land Use Planning Handbook, Appendix C).

O4-38: Thank you for your comment. See responses P1-1, and O5-16, paragraphs 2 and 3.

O4-39: Under the Preferred Alternative (Alternative D), the boundaries of the Lund Creek RNA/ACEC would be expanded to incorporate other areas with related special values in this vicinity (see Map 55).

O4-40: Thank you for your suggestion. Please see response O5-16.

O4-41: Thank you for your suggestion. A number of options for land adjustments will be considered on a project level basis.

O4-42: The western portion of the Grandmother Mountain Wilderness Study Area was transferred to the Forest Service by Congress with the Arkansas-Idaho Land Exchange Act of 1992. When this happened, BLM travel restrictions no longer applied to the transferred portion of the WSA. OHV damaged areas in the vicinity of Grandmother Mountain and Grandfather Mountain along trails 251 and 275 are already managed by the Forest Service.

Comments

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O4 (Cont.)

Responses

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O4 (Cont.)

O4 (Cont.)

Responses

Comments

O4 (Cont.)

O5

Bureau of Land Management
Coeur d'Alene Field Office
ATTN: RMP
1808 N. Third Street
Coeur d'Alene ID 83814

April 13, 2006

RE: Idaho Conservation League and The Wilderness Society comments on the Coeur d'Alene Field Office Resource Management Plan DEIS

Dear Mr. Thomson:

Thank you for allowing the Idaho Conservation League and The Wilderness Society to comments on the Bureau of Land Management's Coeur d'Alene Field Office Resource Management Plan DEIS. The Idaho Conservation League (ICL) and The Wilderness Society (TWS) have a long history of involvement with land management issues.

As Idaho's largest state-based conservation organization, ICL represents over 9,000 members, many of whom enjoy these areas for recreation and educational purposes and have a deep personal interest in protecting the ecological integrity of our public lands.

TWS seeks to insure that natural resource management decisions are based on sound science and that the ecological integrity of the public lands is preserved.

1 Our main concern with the DEIS involves the absence of a sufficient range of alternatives and the lack of specificity included in the description of alternatives and potential environmental impacts. We feel that the document fails to consider a full range of reasonable alternatives in enough detail to provide the decision-maker and the public with an understanding of the full scope of possible options to achieve a purpose or goal, as required by NEPA. As a result, we strongly feel that the FEIS should provide for an additional comment period in order to adequately consider issues and concerns and to provide the public with an additional opportunity for review.

We look forward to being involved in the revision process for the Coeur d'Alene RMP. As your office conducts further analysis on this proposal, we hope that you will fully address our concerns and ensure that we remain on your mailing list for all future NEPA documents, mailings, or other materials associated with this analysis.

Our detailed comments are attached below.

Sincerely,

/s/ Jonathan Oppenheimer
Jonathan Oppenheimer
Idaho Conservation League

/s/ Craig Gehrke
Craig Gehrke
The Wilderness Society

Responses

O5-1: Direction in resource management plans is intentionally general in nature. More specificity and detail is provided during implementation when actions and site-specific projects are proposed. The alternatives for the Draft and Proposed RMP were prepared in accordance with federal regulations and BLM policy. 43 CFR 1610.0-5 (k) states "It [a resource management plan] is not a final implementation decision on actions which require further specific plans, process steps, or decisions under specific provisions of law and regulations." Regarding plan decisions, the BLM Land Use Planning Handbook (H-1610-1) Appendix C, specifies that "These broad-scale decisions guide future land management actions and subsequent site-specific implementation decisions." Even though the alternatives are general, BLM made every attempt to be as specific and quantitative as possible when analyzing the effects.

Comments

O5 (Cont.)

Idaho Conservation League and The Wilderness Society Comments on the Coeur d'Alene Field Office Resource Management Plan DEIS

Vision / Mission

2 The vision statement provided in the DEIS is derived from the BLM mission statement and is thus too brief and vague. The BLM should develop and clearly articulate its vision and mission for the Coeur d'Alene Resource Area and develop goals that will move management in the direction of protecting and achieving its vision. The overall vision of the BLM should demonstrate a dedication to the "prevention of unnecessary or undue degradation" of natural resources **(43 U.S.C. Sec 1732(b)).**

Decades of heavy mining on BLM lands have resulted in a degraded landscape. The future vision for the Coeur d'Alene Field Office should be one of restoration and conservation.

Regulatory Compliance

FLPMA

3 The Federal Land Policy and Management Act (FLPMA) requires the BLM to develop and periodically revise land use plans guiding the management of public lands. Indeed, FLPMA mandates that "public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values." 43 USC § 1701(a)(8). FLPMA requires that BLM develop RMPs that comply with several statutory criteria. The BLM need to specify how they intend to satisfy each of these criteria during the planning criteria stage. We would like to offer the following recommendations for complying with several of the criteria contained in FLPMA:

4 **Multiple use and sustained yield (43 U.S.C. Sec 1712(c)(1)):** This criteria requires that management plans must provide for and protect a wide variety of uses, both market and non-market. When planning for multiple uses, the BLM should be cautious not to assign undue weight to resource extraction or other economic uses and should carefully consider the importance of preserving the Coeur d'Alene Resource Area's scenic and cultural resources for future American publics.

5 **Areas of Critical Environmental Concern (ACECs) (43 U.S.C. Sec 1712(c)(3):** This criteria requires the BLM to give priority to the designation and protection of ACECs. The RMP DEIS considers alternatives having various numbers of ACECs, however, the number of ACEC designations cannot be determined prior to the completion of a survey designed to identify areas that are appropriate for ACEC designation. The BLM needs to conduct such a survey and designate any and all areas deemed appropriate. A particular area will either warrant designation or not; this is not an issue that should vary by alternative. The BLM should use this opportunity to identify new ACECs, which may include areas with critical wildlife habitat, fragile soils, riparian corridors, unique geological and/or archeological features, distinctive biological/ecological communities, and other significant resources. The BLM should also identify links between new and existing ACECs and consider these interconnections when making management

O5 (Cont.)

decisions.

6 **Inventories (43 U.S.C. Sec 1712(c)(4):** The BLM needs to maintain a complete and current inventory of the lands and resources included in the Coeur d'Alene Resource Area and to rely on these inventories at all stages of the planning process. The BLM should use the inventory process to identify areas suitable for special designation. We urge the BLM to limit development activities where public resources have not been fully inventoried.

7 **Cost/Benefit Analysis (43 U.S.C. Sec 1712(c)(7):** When conducting cost/benefit analyses, the BLM needs to assess the relative scarcity of values and the availability of alternative sources of those values **(43 U.S.C. Sec 1712(c)(6).** The BLM should assign additional weight to those values that are found to be scarce across the nation, such as wilderness and critical habitat. We ask the BLM to disclose the methods and criteria used in cost/benefit analyses.

8 **Pollution Control (43 U.S.C. Sec 1712(c)(8):** We recommend that the BLM coordinate with the EPA and disclose in their RMP specifically how they plan to comply with relevant pollution control laws such as the Clean Water Act. This is a particularly crucial provision given the prevalence of mining activity and history of pollution issues affecting watersheds in or near the Silver Valley Mining District.

NEPA

9 NEPA requires that each EIS examine a range of alternatives to the proposed action, including a no action alternative. 42 USC § 4332(C)(iii). The alternatives considered must be of sufficient range to provide both the decision-maker and the public with an understanding of the full scope of possible options to achieve a purpose or goal. The alternatives should be compared so as to "sharply [define] the issues and [provide] a clear basis for choice among options by the decision-maker and the public (40 CFR 1502.14). We believe that the DEIS has not adequately captured the full scope of options nor defined the issues to be considered during the decision-making process. The description of alternatives as well as much of the analysis of environmental consequences are terribly vague and fail to provide the level of specificity needed to guide an informed decision.

10 The alternatives proposed should be *reasonable* and serve the purpose of the proposed action. Thus, all alternatives proposed must meet the basic requirements of a FLPMA management plan. This means each alternative must protect a wide variety of resources and uses and not favor any one use or group of uses of the land, and each alternative must follow the multiple use sustained yield dictate of FLPMA. It is our position that the alternatives considered in the DEIS are not reasonable. Alternatives B and C represent extremely unbalanced options, each emphasizing a particular goal (commodity production and preservation) to a fault. Neither is at all practical, especially given the FLPMA's multiple use mandate. Further, the supposedly "middle ground" Alternative D does not represent an accurate union of Alts. B and C. Therefore the range of alternatives does not represent a full and accurate range of reasonable options.

Responses

O5-2: The vision statement must be general in nature. The BLM Land Use Planning Handbook (H-1601-1) states that "vision should reflect the goals that are common to all alternatives" (BLM 2005). It further specifies that "goals are broad statements of desired outcomes (e.g., maintain ecosystem health and productivity, promote community stability, ensure sustainable development) that usually are not quantifiable. Thus, in order to reflect broad goals, the vision must be non-specific.

O5-3: The RMP has been prepared in accordance with FLPMA requirements and is in compliance with all other statutes. Actions intended to ensure that the CFO comply with these requirements are spelled out in Chapter 2 of the DRMP/EIS.

O5-4: All of the alternatives provide for variations in the balance of multiple uses. Analysis of the effects of the alternatives revealed that none exceed a sustainable yield for any resource.

O5-5: BLM relied on existing inventories and other data sources in all stages of the planning process to include analysis of special designations. BLM Manual 1613 describes the ACEC designation process. This manual states that "a potential ACEC (or portion thereof) must be shown as recommended for designation in any or all alternatives in the draft RMP." It further states that "to be designated as an ACEC, an area must require special management attention to protect the important and relevant values." Management direction that would protect these values in potential ACECs not designated under Alternative D, are described in Appendix G.

O5-6: BLM relied on existing inventories and other data sources in all stages of the planning process to include special designations. However, not all BLM inventory information is reproduced in the RMP. Based on the number of comments received concerning or relating to recreation settings, BLM added the Recreation Opportunity Spectrum to Maps 20-23 (Special Recreation Management Areas). These maps, as well as maps 46-64 for ACECs, Maps 65-68 for other special designations, and Map 71 for eligible Wild and Scenic Rivers, synthesize inventory information on areas suitable for special designation. During project-level planning, which would be conducted prior to any development activities, BLM will complete more detailed inventories as required by federal laws, regulations, and BLM policies.

O5-7: 43 U.S.C. Sec 1712(c) states: "In the development and revision of land use plans, the Secretary shall-." Subparagraph (c)(7) states "weigh long-term benefits to the public against short-term benefits." The term "cost-benefit analysis" does not appear. Short-term and long-term economic effects of the alternatives are discussed in Section 4.5.1.

O5-8: Several sections of the alternatives address how BLM plans to comply with the major relevant pollution control laws. For the Clean Air Act see Air Quality Goal AQ-1

(continued on the following page)

Responses
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O5-8 (Cont.): with the Objectives AQ-1.1, AQ-1.2 and AQ-1.3 that address air quality standards and regulations. For the Clean Water Act see Water Resources Goal WA-1 and Objectives WA-1.1, WA-1.2 and WA-1.3 which address water quality standards and regulations. In the Health and Safety section Goal SE-2 addresses procedures and Objectives SE-2.3, SE-2.4, SE-2.5 and SE-2.6 address compliance with federal and state regulations. Objective SE-2.5 specifically addresses the coordination and work efforts in Silver Valley watersheds.

O5-9: Please see response O5-1.

O5-10: BLM was careful to ensure that all of the alternatives were reasonable. The variation in emphasis of each alternative provides for the range. If each alternative equally balanced use and protection, then there would be no range. For many resources and uses, CDAFO has a very restricted decision space due to governing laws, regulations, policies, and standing agreements. The result is little to no variation among alternatives for some objectives and actions. An example of this is management direction proposed for invasive species and noxious weeds. In addition, for resources or uses for which current management was deemed adequate, or somewhat adequate, BLM carried such management forward, with little or no change. This was the case for INFISH/CNFISH.

Comments

O5 (Cont.)

The comments below indicate and discuss more fully some areas of the BLM analysis that we feel are especially inadequate in terms of providing a comparative analysis of a full range of reasonable alternatives as required by NEPA. Though we have not included specific comments on every topic that we feel was not adequately analyzed, we maintain that the following management topics included in the DEIS were not examined in enough detail, nor across what could be considered a full range of reasonable alternatives:

-Air Quality (fails to provide full range of alternatives)
-Geology (nonspecific; fails to provide full range of alternatives)
-Soil Resources (fails to provide full range of alternatives)
-Water Resources (fails to provide full range of alternatives-might consider comparing impacts resulting from implementation of INFISH v. CNFISH standards in different alternatives)
-Vegetation –Riparian and Wetlands (nonspecific; fails to provide full range of alternatives)
-Vegetation-Nonforested (nonspecific)
-Vegetation-Invasive and Noxious (nonspecific; fails to provide full range of alternatives)
10 -Special Status Species (fails to provide full range of reasonable alternatives – bias towards preferred alternative)
-Visual Resources (nonspecific-need to be more specific about what management would look like under Classes I, II, III, and IV-descriptions on p. 3-48 are too vague)
-Forestry and Woodland Products (fails to provide full range of alternatives – overemphasizes commodity production)
-Livestock Grazing (nonspecific; fails to provided full range of reasonable alternatives-acreage available for grazing represents two extremes rather than several reasonable options)
-Minerals (fails to provide full range of alternatives-overemphasizes commodity production)
-Recreation (fails to provide full range of alternatives-emphasizes motorized recreation over preservation)
-Renewable Energy (nonspecific; fails to provide full range of alternatives)
-Transportation and Travel (fails to provide full range of alternatives-overemphasizes motorized travel)
-Lands and Realty (fails to provide full range of alternatives)
-Special Designations (fails to provide full range of reasonable alternatives; certain sections represent two extreme and unreasonable options, particular that dealing with WSR designations; other sections overemphasize commodity production, particularly that dealing with WSAs.)

11 Each EIS must also include a cumulative impacts analysis. Cumulative impact is "the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions." 40 CFR 1508.7. Thus, BLM must consider the impact of any proposed changes to land management, as well as the combined impacts from other activities that may impact the same resources. This includes other activities, whether on federal land or not, that may impact water quality, Threatened, Endangered & Sensitive (T, E, & S) species, and any other resources that may be impacted by the new resource management plans. The DEIS does not adequately

O5 (Cont.)

11 assess cumulative impacts, particularly as they include management direction as it relates to actions and projects on Forest Service, tribal, state, and private lands. This element of cumulative impacts is critical in this case given that small parcels of BLM lands are widely dispersed across an area with such diversified management.

ESA

Populations of Threatened, Endangered and Sensitive (T, E & S) wildlife species occupy terrestrial and aquatic habitat in the Coeur d'Alene Resource Area. This includes, but is not limited to bull trout, gray wolf, grizzly bear, woodland caribou, and Canada lynx. Numerous populations of T, E & S Plants also occupy the lands managed by Coeur d'Alene BLM.

The ESA prohibits federal agencies from taking actions that "jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of [critical] habitat of such species." 16 USC 1536(a)(2). To ensure compliance with the no jeopardy requirement, action agencies must engage in consultation with the Fish and Wildlife Service or NOAA Fisheries before engaging in a project that may affect listed species. Id.; Thomas v. Peterson, 753 F.2d 754, 764 (9th Cir. 1985). The Ninth Circuit has specifically ruled that land management agencies must engage in consultation on plans that set guidelines for future resource management decisions, such as RMPs. Pacific Rivers Council v. Thomas, 30 F.3d 1050 (9th Cir. 1994) (Forest Service management plans "are important programmatic documents that set out guidelines for resource management in the forests involved in this case. As such, the LRMPs constitute continuing agency action requiring consultation under § 7(a)(2) of the ESA."). The DEIS indicates that the BLM did not consult with either the FWS nor NOAA Fisheries during this NEPA analysis and that the only ESA consultation that took place at all involved accepting informal recommendations from the Idaho Panhandle National Forest regarding how to address issues related to habitat protection (p. 5-6).

12 Because of the perilous status of bull trout, the new RMP must include adequate standards to protect and recover these species to ensure that their continued existence is not jeopardized. This should be a significant focus of the RMP revision. It is unclear whether the BLM consulted with NOAA Fisheries or with the FWS when developing its CNFish Strategy, though it appears unlikely since neither of these agencies were consulted during the preparation of this DEIS.

Wild and Scenic Rivers

According to the BLM's Wild and Scenic Rivers Eligibility and Suitability Study outlined in Appendix J, five stream segments in the management area were found to be eligible and four were found to be suitable under the WSRA criteria. Yet the DEIS indicates that the number of these streams that will ultimately receive suitability recommendations will vary by alternative. Though this approach may be in accordance with the BLM 8351, the decision not to make a
13 suitability recommendation for one or all (as with Alternative B) of the stream segments found to have met WSRA suitability criteria would appear to be arbitrary and capricious in the absence of any clear rationale as to why this determination was made. Nowhere in the DEIS is any such rationale provided. Action SD-B2.1.1 under Alternative B calls for "a nonsuitablility determination" for the five stream segments that have already been identified as suitable (p. 2-125). There does not appear to be any explanation for why the BLM would decide to change its

Responses

O5-11: The cumulative impacts analysis is based on the best available information. Please see Table 4.1.3.1 for criteria used in determining cumulative impacts. In addition, BLM has added to the cumulative impact sections of Chapter 4 for clarification and to provide missing information.

O5-12: The USFWS has been involved in the planning process and the BLM has formally consulted with them. The RMP incorporates stipulations that were developed directly by the USFWS or in coordination with them. During the Section 7 consultation process, the BLM has refined these stipulations. These revisions are reflected in the Proposed RMP / Final EIS.

See Chapter 5 for more information about consultation with USFWS. BLM did not consult NOAA because no anadromous fish species inhabit the planning area.

Goals SS-1 (conserve listed species) and SS-2 (ensure BLM actions are consistent with conservation needs of listed species) include bull trout. Specific objectives and actions for bull trout protection and recovery are found mainly in CNFISH (Appendix D and E). Bull trout were strongly considered when developing CNFISH and in the prioritization of restoration and conservation watersheds.

O5-13: The Wild and Scenic Rivers Eligibility and Suitability Study included as Appendix J of this DRMP/DEIS is a Draft. Although the determinations presented are based on the best available information, the eligibility and suitability determinations have not been finalized. In accordance with BLM Handbook 8351, the public is afforded the opportunity to comment and provide input into the Wild and Scenic Rivers process. Consequently, the final determinations will consider any additional information provided as a result of the review period for this document. The range of suitability determination included in the DRMP is in accordance with BLM Manual 8351 as you have noted, and the purpose of presenting this range is two-fold. First, the range of determinations allows the public an opportunity to comment and provide additional input/information on the entire suite of river segments being considered. Secondly, it meets the NEPA requirements for analyzing a reasonable range of alternatives. The BLM Planning process and NEPA allow for portions of different alternatives to be brought forward into the Proposed RMP and ultimately the Final RMP. The final determinations of eligibility and suitability will be based on the Wild and Scenic Rivers Act requirements and the determination criteria outlined in BLM Handbook 8351, and will be independent of alternative selection.

Comments

O5 (Cont.)

suitability determination under this management option. Furthermore, under this alternative, the BLM would "take no Wild and Scenic River management actions." However, according to the WSRA and the BLM's manual, the BLM is required to engage in "Protective Management," of eligible streams until their classification changes so as not to alter their eligibility.

13 The new RMP should in fact include strong direction for protection of eligible and suitable rivers. The RMP should prohibit any activities prohibited under the WSRA on eligible or suitable rivers until a final determination is made by Congress. This should include withdrawal of all mineral rights in eligible or suitable river corridors pending a final decision. The new RMP should also include direction on management of designated rivers, in the event that any rivers in the planning area are designated as Wild and Scenic. Direction should address topics such as natural and prescribed fire, noxious weeds, habitat function and connectivity, tree disease and pest control, upstream/downstream hydropower, flood control, bridges, noise, motorized use on the river and in the river corridor, as well as other traditional topics like logging, mining and road building.

WSAs

14 We have some concerns about how existing WSAs will be managed if released by Congress from further study. First of all, there are some inconsistencies between the Visual Resources section and the Special Designation section in terms of the VRM Classes proposed for the three existing WSAs under each of the alternatives. In the Special Designations section, it states that the Grandmother Mountain and Crystal Lake WSAs would be managed as Class II under all of the alternatives, but in the Visual Resources section, it states that they would be managed as a Class I under Alternative C. Similarly, under the Special Designations section, it states that the Selkirk WSA would be managed as Class II under all of the alternatives, but under the Visual Resources section, it states that the Selkirk WSA would be managed as a Class III under Alternatives B and D. The FEIS needs to clarify these apparent inconsistencies.

15 Moreover, although once the WSA are released from further study, the BLM might legally be allowed revert to management activities that are inconsistent with the wilderness character of these areas, we strongly urge the BLM not to do so. These three WSAs provide the BLM with an excellent opportunity to preserve non-commodity values without altering management practices. The BLM should continue to manage these areas as Class I in order to maintain their wilderness character.

Additional comments regarding WSAs are included in our Protection of Wilderness Character section below.

Roadless areas

16 The DEIS does not discuss roadless areas occurring in the management area. As mentioned above, FLPMA mandates that federal agencies maintain "an inventory of all public lands and their resource and other values (43 U.S.C. Sec 1712(c)(4)," which should include tracking of any special resources, such as roadless areas. FLPMA mandates that this inventory "be kept current so as to reflect changes in conditions and to identify new and emerging resource and other

O5 (Cont.)

16 values." 43 USC 1712§ (a). Thus, the BLM cannot rely on outdated roadless area inventories for information on the amount of primitive lands within the Coeur d'Alene Resource Area.

17 Roadless areas identified in the new inventory should be given special protection under the new RMP. There are at least 13 separate BLM land parcels in the resource area that are adjacent to Forest Service Inventoried Roadless Areas (See Attachment 11). These areas should be given special attention, as there are several areas that have not been included in previous inventories that should be protected. Protections for these and other areas should include a ban on road building, mining, or other resource extraction or development activities in the limited number of roadless areas. This is in accordance with the multiple use-sustained yield mandate of FLPMA. Under this direction, agencies are free to acknowledge that while multiple uses must be supported system-wide, in particular areas there may be some activities that are more or less suitable than others. The BLM should coordinate their management plans with those of the Forest Service to ensure that these critical areas are adequately protected.

18 FLPMA also requires that agencies consider the scarcity of values being considered in management decisions. 43 USC § 1712(c)(6). There are very few roadless areas remaining in the Coeur d'Alene Resource Area. It is necessary and appropriate that federal land managers protect these important vestiges of primitive America, which provide important recreational, ecological and cultural values.

Transportation and Travel

The DEIS does not provide sufficient information about existing roads and transportation and travel management plans in the Coeur d'Alene Resource Area. It does state that an inventory revealed that there are approximately 376.8 miles of roads and trails throughout the planning area (p. 3-57), but it mentions nothing about road densities nor does it discuss the existence of roads and trails in ecologically sensitive areas. Moreover, though it mentions that a comprehensive inventory of road and trail networks was completed, the inventory is not included with the DEIS. More complete information is needed to develop an informed management plan.

19 There is very little difference in the acreage of open, limited, and closed designations being proposed for alternatives, B, C, and D. These alternatives thus do not represent a sufficient range that demonstrates the full scope of options available. Moreover, the acreage for closed designations being proposed for all alternatives is unacceptable. That is, closing less than 1% of BLM lands to motorized travel leaving more than 99% of lands open to limited motorized travel is not sufficient for the purposes of preserving the ecological integrity of these lands. The devastating impacts of inappropriate use of motorized vehicles on natural ecosystems are well established. They accelerate erosion, degrade water quality, disturb wildlife, spread noxious weeds, fragment wildlife habitat, and disturb non-motorized forest users. We urge the BLM to consider an alternative that closes more acreage of BLM land to motorized travel. Motorized vehicle use must not be allowed in areas with sensitive or highly erosion-prone soils, or at times of the year when soil conditions are inappropriate for such use.

Responses

O5-14: Thank you for pointing out these inconsistencies. These will be reconciled in the PRMP/FEIS.

O5-15: Two of the WSAs, Crystal Lake and Grandmother Mountain are proposed as special recreation management areas with management objectives to provide for dispersed backcountry forms of recreation. The visual resource management Class I objective is preservation while the Class II objective is retention. Both are protective and limiting of management activities that would alter the landscape. Class I is generally reserved for designated wilderness areas, wild sections of national wild and scenic rivers and other congressionally and administratively designated areas with a "preservation" objective.

O5-16: Please see response O4-1. The BLM used "roadless" as a criterion during the wilderness inventory process in accordance with FLPMA. However, the BLM carries out no "roadless area" management outside of designated WSAs. Consequently, the BLM does not use the term "roadless area" as a land use classification or as a specific designation similar to how the Forest Service does.

In accordance with the land use planning handbook, H-1601-1 and Instruction Memorandum No. 2003-275, characteristics may be considered in the land use planning process. "The BLM can make a variety of land use plan decisions to protect wilderness characteristics, such as establishing Visual Resource Management (VRM) class objectives to guide placement of roads, trails, and other facilities; establishing conditions of use to be attached to permits, leases and other authorizations to achieve the desired level of resource protection; and designating lands as open, closed or limited to Off Highway Vehicles (OHV) to achieve a desired visitor experience." Actions in all these areas and more are proposed.

Please review Maps 20-23 depicting recreation settings. The Coeur d'Alene Field Office manages no lands which exhibit primitive settings and 47,601 acres which exhibit semi-primitive settings. Over 94% or 44,468 acres are proposed for Special Recreation Management Area designation with accompanying prescriptions to maintain the semi-primitive character of these lands. (See the following Actions: RC-D1.1.1, RC-D1.5.1, RC-D1.5.4, RC-D1.6.1, RC-D1.6.4, RC-D1.8.1, and RC-D1.8.2).

O5-17: Please see response O5-16.
(Note: The map submitted by the commenter shows dated land status. Two areas no longer contain BLM land and a substantial portion of another area was transferred to the Forest Service.)

O5-18: Thank you for your comment.

O5-19: Please refer to Maps 37-40. Due to scale and for clarity, not all routes are shown. However, all those proposed to be designated as motorized routes are shown. Other routes exist and may remain available for non-motorized uses.

Although no alternative closes a large percentage of the CDAFO to motorized uses, Alternatives B-D restrict OHV use on virtually all of the land to established roads and trails, eliminating cross-country travel (except by snowmobiles). This is a drastic change over existing conditions, and reflects the best balance possible in meeting the BLM's multiple use management needs.

Comments

O5 (Cont.)

20 We do not feel that Alternative D represents an attempt to balance multiple uses. Widespread and largely unrestricted motor vehicle use is incompatible with the values and resources found in these areas.

21 As part of this planning process, the BLM should conduct a formal road analysis that can be used to designate a transportation network that retains the minimum number of routes necessary to provide for reasonable access. The RMP must include scientifically-based standards dictating when new road construction will be allowed, where they should be constructed, and when roads should be decommissioned. It should include an objective set of criteria with which the BLM should evaluate every proposal for new road construction. The evaluation criteria should include whether the proposal is in an environmentally sensitive area, such as a riparian area, unroaded area, landslide prone area, or steep slope. It should also include whether the road is needed, for long-term access, whether there are alternative access routes or methods, and whether the BLM has sufficient funds to maintain additional roads. Extraneous, duplicative, unstable or little used routes should be closed, decommissioned and rehabilitated. The RMP should also require establishment of a road decommissioning fund. The BLM should establish maintenance agreements with the county, state, and/or road districts to conduct their road maintenance in the least impacting ways possible.

22 Though the DEIS mentions several times the increasing demand for motorized recreation on BLM lands in the management area, it fails to address the issue of monitoring motorized vehicle use. Especially given the demand for ORV use, enforcement of the regulations must be a top priority for the BLM. Designated routes should be established and the BLM should establish routes as being closed unless posted open. Motorized vehicle use off of designated routes should be strictly prohibited and enforced, especially into WSAs and other identified sensitive areas. Parking areas or turnouts should be located in areas that have already been disturbed and should not damage natural, cultural and scenic values in their location. Informal, unofficial or undesignated parking areas and turnouts should be closed and restored. Safety signs and posted speed limits along major routes. The BLM should provide maps and educational materials for recreational motorized use. If necessary, temporary safety signs should be located along the road to warn drivers of hazardous conditions, like excessive gravel, water, cattle, burning or logging operations and other obstacles along the road. Cattle guards, culverts, bridges and gates should be maintained in good and safe condition.

23 The BLM should establish a monitoring program and undertake relevant transportation studies to understand how increased visitation has impacted the natural resources of the landscape. In doing so, the BLM may consider coordinating with the state, tribes, the Forest Service, and other entities having their own transportation plan or owning land adjacent to BLM lands. The need to address sightseeing/recreation routes and facilities should be considered and appropriately addressed to direct people to areas while preventing resource damage. BLM should only designate administrative routes after detailing the specific use for the routes and a clear direction to close and rehabilitate the route once the purpose no longer exists.

O5 (Cont.)

Recreation

24 There does not appear to be a great deal of difference between the recreation plans established by the four different alternatives. Specifically, each of the alternatives appears to emphasize increased use (especially motorized use) over preservation. We recommend considering alternatives that represent a much greater range of management options. In particular, alternative C should include more restrictions geared towards restoring and maintaining ecological integrity and protecting resources from harmful, excessive, or irresponsible recreational use.

25 Regardless of which alternative is adopted, the BLM needs to incorporate into its RMP some basic conservation efforts in order to prevent undue or excessive environmental degradation. Currently, where the DEIS does include provisions for protecting natural resources from harmful use, the language is quite vague and uncertain. The BLM should be specific in identifying the uses that will be acceptable and allowable in designated areas and settings. The BLM also needs to develop a plan for monitoring and enforcing use restrictions in specified areas. Recreation opportunities for visitor exploration and discovery should focus on activities in an undeveloped, primitive setting. The BLM should encourage non-motorized recreation by establishing trailheads for hiking, bicycling, walking, horseback riding, sightseeing and wildlife viewing. Competitive events should be limited or prohibited on BLM land in these landscapes. Other areas may be identified for these events, including private property. BLM should be very cautious in issuing special use permits for recreational or commercial purposes. Certain permitted uses should be required to pay for the monitoring necessary to make sure they are compliant with the terms of their use and prevent unnecessary resource damage. This may even include paying for a BLM staff person to accompany the group in their activities. BLM should also incorporate a cost analysis and cost recovery program into the issuance of special use permits. Such uses should be required to post bonds for unintended resource damage and restoration. Special uses should also pay for the costs of the BLM to administer and monitor their uses, including staff time in evaluation and processing of the permit.

Vegetation and Forest Management

26 As stated previously in these comments, we are concerned that the lack of an informing analysis has impacted the development of the alternatives, and will thus affect the ability of the decision-maker to make an informed decision. Specifically with regards to vegetation management, we are concerned that the reliance on coarse GAP Analysis data does not suitably reflect an on-the-ground inventory of forest types, habitat types, vegetation communities and associated vegetative conditions.

27 With regards to the development of the Annual Sale Quantity (ASQ) estimates, we feel that the analysis is disingenuous. The alternatives displayed, and specifically the Alternative D, does not represent a "balanced" approach between commodity and conservaion empahses. Instead, by averaging the ASQ from Alternative A (No action) and Alternative B (Commodity), the preferred alternative does not reflect n balance at all.

28 Instead, at a minimum, if the intent is to have Alternative D reflect a balance between Alternatives B and C (Conservation), the ASQ should reflect an average of the 5.1 mmbf and

Responses

O5-20: BLM agrees that widespread and largely unrestricted vehicle use is incompatible with our multiple use resource management objectives. Consequently, the proposed action would "close" 631 acres to all OHVs and would establish a "limited" travel designation on the remaining 96,139 acres restricting motor vehicles to certain designated routes (Action TM-D1.1.1). Please refer to Maps 37-40.

O5-21: Please see Appendix B of the RMP for evaluation criteria for road construction. Please see Actions FW-D2.1.4 and 2.1.5 for BLM policy on decommissioning of newly-constructed roads and road density.

O5-22: Thank you for your suggestion. See response P42-1, paragraph 1. Site specific management actions are analyzed, evaluated, and determined at the activity planning level which follows adoption of the RMP. Some of the RMP proposed actions describe a "framework" for the activity planning that will follow. For those that relate to the travel planning issues you raise refer to TM-D1.1.9, RC-D1.2.6, RC-D1.3.5, RC-D1.4.4, RC-D1.5.5, RC-D1.6.4, RC-D1.7.2, RC-D-1.7.3 and RC-D1.8.2.

O5-23: Thank you for your suggestion. See response O5-22. Monitoring programs are established at the activity planning level. Coordination with other agencies is required by Action RC-D1.7.3. Sightseeing routes are identified as "Backcountry Byways". Refer to Actions SD-D4.3.1 and 4.3.2.

O5-24: There is a very broad range to the recreation alternatives. Please refer to Actions RC-A1.1.1, RC-B1.1.1, RC-C1.1.1 and RC-D1.1.1. Allocations for recreation management vary from a low of 651 acres in Alternative A to a high of 79,152 acres in Alternative D. This is a range from 7% of the BLM lands to 79%. Allocations for recreation in alternatives B and C are similar in size, 63,928 acres (66%) and 61,667 acres (62%) respectively. However, there would be a marked difference between the settings managed. Alternative B has a community-based market emphasis and 70% of the BLM lands exhibiting rural and roaded-natural settings would be allocated for recreation management. Conversely, Alternative C has an undeveloped/dispersed market emphasis and 94% of the BLM lands exhibiting semi-primitive settings would be allocated for recreation management while only 7% of the rural and 37 % of the roaded-natural lands would be so allocated.

Each alternative makes concessions for the fact that the population of northern Idaho will increase significantly over the life of this plan, placing more pressure on public lands for diverse recreation and commodity needs. The range of alternatives considers the range of resource issues that could foreseeably arise under the life of the plan and attempts to strike the best balance between the needs of the various user groups.

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Responses
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O5-25: Conservation measures designed specifically to reduce the chances of environmental degradation while managing resources for a multitude of uses are outlined in the alternatives for most resources. T&E species, watersheds, riparian areas, non-forested areas, and areas designated as ACECs are examples of resources for which specific conservation measures have been developed. The level of detail that the commenter is asking for is appropriate for project-level documentation, but not for a document that must be flexible enough to allow for changing conditions and a wide variety of potential types of projects over the life of the plan. Special uses are only allowed when there is a demonstrated public need or benefit and the uses are consistent and compatible with the area's management objective and managed condition. Permit issuance is discretionary. Standard administrative procedures have long been in place for managing special use permits. Substantial guidance is contained in the BLM Recreation Permit Administration Handbook, H-2930-1. Cost recovery is directed "if more than 50 hours of staff time is required for processing a permit" (pg. 21). Recovery charges can be based upon the actual personnel, vehicle, travel and materials costs required to issue, administer, and monitor the permit. Bonds may be imposed by the authorized officer. They may be in the form of a cash bond, payment bond, or surety bond and will "be sufficient to defray the costs of restoration, reclamation, or rehabilitation of the lands affected by the permitted use" (pg. 39). "Permits are monitored for compliance with stipulations, terms, and conditions. The amount of such monitoring is commensurate with the resource values at risk, the permittee's past record of compliance, and the ability to obtain monitoring services through other means such as local police, other permittees, the public, and other factors" (pp. 41-42).

O5-26: BLM feels that for the purposes of a programmatic document such as an RMP, in which site-specific decisions are not being made, GAP data is sufficient. Site specific, on the ground data will be collected as part of any follow-up action, including forest treatments, fire management actions, and mineral actions. Guidance on the level of detail and decision-making in an RMP is given by 43 CFR 1610.0-5 (k), which says "It [a resource management plan] is not a final implementation decision on actions which require further specific plans, process steps, or decisions under specific provisions of law and regulations" and by BLM LUP Handbook (H-1601-1), Appendix C, page 1, which specifically says "Land Use Plan Decisions: These broad-scale decisions guide future land management actions and subsequent site-specific implementation decisions."

O5-27: ASQ is described in Chapter 3, Section 3.3.1. The Allowable Sale Quantity (ASQ) was the term used in the old Management Framework Plan (MFP) (and applies to Alternative A) which assigned an annual sale quantity that had to be met. The PSQ is not a mandatory quantity that must be met, but is the estimated quantity of forest products that may be produced as a result of land treatment actions described in Alternatives B, C and D.

O5-28: Alternative D was arrived at by determining how many acres could be treated over the life of this plan (15 years) considering realistic constraints of estimated funding and manpower availability.

Comments

O5 (Cont.)

28 880 mbf identified in each of those alternatives, respectively. This would yield an annual ASQ target of approximately 3 mmbf.

29 Further, it is not apparent, how the ASQ estimates were developed. A clear rationale for how ASQ estimates were developed should be incorporated into the FEIS. As it now stands, the alternatives displayed do not provide the decision-maker with a reasonable range upon which to base their decision.

30 With regards to management of old growth, we encourage you to set attainment targets to ensure that a variety of forest structures are maintained for the benefit of wildlife resources, as well as for the public and other purposes. With this in mind, we urge you to consider a specific goal of increasing old growth forests throughout the resource area. As currently written, a perverse incentive to log late-seral and mature forest stands before they meet old growth definitions could be an unintended result of the preferred alternative as written. Instead, any adopted alternative should clearly promote the recruitment of future old growth stands, in order to ensure habitat variability across the ownership.

31 Finally, the DEIS does not provide sufficient direction for vegetation and forest management direction as it relates to numerous important forest issues. This would include variation between dry and moist forest management emphases, response to insect and disease, forest restoration goals and objectives, priority areas for fuels reduction, impacts of climate change, and other issues.

32 We strongly encourage you to elaborate on these and other forest and vegetation management issues in the FEIS and to provide for further public comment and review, in advance of the issuance of a Record of Decision.

Fire Management

33 We are encouraged that the direction for fire management will incorporate Wildland Fire Use (WFU) in all areas outside of the Wildland-Urban Interface (WUI). We encourage you to work cooperatively with the Forest Service and other federal land management agencies in the development of interagency Fire Management Plans, as required by the 2001 Federal Wildland Fire Management Policy and Review.

34 Special consideration for WFU should apply in WSAs, as well as in areas directly adjacent to Forest Service-administered Inventoried Roadless Areas.

35 By increasing options for WFU, the BLM can reduce firefighting costs, restore fire-adapted ecosystems and safeguard firefighters. Further, we recognize that including an area for consideration of WFU does not preclude other management responses. However, the adoption of a clear and concise WFU policy allows for an appropriate management response, which can accomplish the resource goals of the plan at minimal cost to the taxpayer and the environment.

36 We also strongly endorse the application of Minimum Impact Suppression Tactics and encourage you to provide for greater clarity in the FEIS. Proposed direction would apply MIST in "special designation areas e.g., WSA, ACEC, Recreation Sites, etc.)" This list should be expanded and

O5 (Cont.)

36 clarified to include habitat for T, E, & S species, roadless areas, old growth, unique sites, and other sites of cultural, ecological, recreational and scientific importance.

37 Finally, as has been raised previously in these comments, we do not feel that the alternatives developed represent a reasonable range of alternatives with regards to fire management.

CNFISH

38 While we appreciate the consideration of a revised strategy for the protection of Inland Native Fish, we are concerned that the Coeur d'Alene Native Fish Strategy (CNFISH), as written, fails to adequately protect habitat for threatened and sensitive species in the area. In light of our concerns, we encourage you to retain the Inland Native Fish Strategy (INFISH) without modification.

39 Specifically, we encourage you to maintain requirements that prohibit activities within Riparian Habitat Conservation Areas/Riparian Conservation Areas (RHCA/RCAs) that would degrade Riparian Management Objectives (RMOs). Further, only activities that would contribute to the attainment of RMOs should be permitted within RHCA/RCAs. This would ensure that resources within RHCA/RCAs are not degraded.

40 Further, direction to protect water quality and fish habitat should apply to all waters administered by BLM within the Field Office area, instead of only those areas occupied by native fish.

41 As currently written, CNFISH could be subject to abuse in several sections. For instance, direction may prove weak and inefficient where the RMP says, road management should "strive to meet [RMOs] and avoid adverse effects to native fish," or activities "should be designed to enhance, restore or maintain…characteristics of the RCA…" Another example where proposed CNFISH direction is lacking with regards to road management is the direction to prohibit, "[s]idecasting of road materials…in watersheds occupied by native fish." Instead, we encourage clear language that requires RMOs not be degraded and that management actions clearly lead to attainment of RMOs.

Protection of Wilderness Character

We are extremely concerned by the failure to identify lands with wilderness characteristics as a separate resource value. The Draft RMP fails to comprehensively analyze the impacts land use planning decisions may have on these lands. The Draft RMP simply states:

> 42 Currently there are three wilderness study areas (WSAs) within the planning area. The RMP will not change this status, and, in accordance with current BLM land use planning policy, no new WSAs will be designated. (ES-2)

The Draft RMP does mention the management of, and potential impacts to the existing WSAs in several sections; however, the inventory of and/or management of additional lands with wilderness characteristics is never discussed. **The failure to include this issue in the Draft**

Responses

O5-29: The ASQ applies only to Alternative A, while the PSQ applies to Alternative B, C, and D. (See explanation for O5-27.

Even though the MFP, under which we are still operating, states that the ASQ is 6.5 MMBF, forested acres lost over the past 20+ years has significantly reduced the number of available forested acres on the CDAFO area that can be treated. The previous ASQ was modified by averaging the acres treated over the past 20 years and applying the treatment actions to these forest vegetation types (Dry Conifer, Wet/Cold Conifer, and Wet/Warm Conifer).

The PSQ was arrived at by applying different treatments based on the three major forest vegetation types and the estimated acres that would treated in each of these forest vegetation types.

O5-30: As noted in Chapter 3, Section 3.2.5, the Dry Conifer and Wet/Warm Conifer vegetation types are deficient in late seral (large trees) stages. The Wet/Cold vegetation type is deficient in early and mid-seral stages. Alternatives B, C, and D deal with these issues by concentrating on creating more late seral stages in the Dry Conifer and Wet/Warm Conifer vegetation types and more early seral in the Wet/Cold vegetation type. Because much of the Wet/Cold Conifer vegetation type is in the late seral stage, this may necessitate cutting some late seral stands. However, Vegetation - Forests and Woodlands Action VF-B1.2.6 places specific restrictions on treatments within the vicinity of exiting old growth stands.

O5-31: Please review management actions for Objectives VF-A1.2, B.1.2, C.1.2 and D.1.2. The RMP is designed to allow for flexibility and a range of options for management of all resources over the life of the plan.

O5-32: Please review management actions for Objectives VF-A1.2, B.1.2, C.1.2 and D.1.2. The RMP is designed to allow for flexibility and a range of options for management of all resources over the life of the plan. Also Chapter 3, Section 3.2.5 discusses insect and disease issues and their impacts on the three forest vegetation types.

O5-33: BLM has coordinated planning with the Forest Service and other adjacent land managers. Following completion of this RMP the BLM will appropriately revise the Field Office Fire Management Plan. This revision will also be coordinated with adjacent land managers.

O5-34: Please see Actions WF-C1.1.2 and WF-D1.1.2 in the Wildland Fire Management section of the alternatives. These actions state that minimum impact suppression tactics (MIST) will be employed to protect valuable resources in special management areas.

O5-35: The completion of the RMP will trigger a revision of the Field Office Fire Management Plan (MFP). This revised MFP will contain more detailed guidance on Appropriate Management Response (AMR) affecting wildland fire use.

O5-36: MIST is a tool often used by Wildland Fire Managers. The use of "etc." in the subject action will provide for use in a great range of situations, to include those identified in your comment.

(continued on the following page)

Responses
(Continued from Previous Page)

O5-37: Lack of variation in the alternatives regarding fire management is a result of the scattered ownership pattern of BLM-administered lands. Adjacent and/or nearby private and State lands limit the options available to manage fire on BLM lands.

O5-38: Many of the Standards and Guidelines in CNFISH are identical in wording to INFISH, and some the BLM believes are actually stronger. For example, the CNFISH RF-2a requires analysis prior to construction of roads and landings in all RCAs, while INFISH only requires this in priority watersheds. In RF-2b INFISH guidance is to minimize roads and landings in RHCAs, while CNFISH guidance is to close existing roads and avoid construction of new roads and landings in RCAs. Also, the CNFISH RCA buffer width for Category 4 non-priority watersheds is 100 feet, while the INFISH RHCA buffer is 50 feet.

O5-39: As written, actions that would degrade riparian resources are prohibited in RCAs. Only those that would result in a net benefit to aquatic and riparian resources would be allowed. RCA-1 states: Activities in RCAs will be designed to enhance, restore or maintain the physical and biological characteristics of the RCA.

O5-40: Though it is called the Coeur d'Alene *Native Fish Strategy*, the strategy does apply to all waters within the planning area. All waters, including non fish-bearing streams, intermittent streams and wetlands have RCAs, and the RMOs and conservation measures apply to all RCAs. By including "native fish" in the title of the strategy, we are indicating our intent to focus our conservation and restoration efforts on fish that are native to the planning area, and not encourage introduced species, especially where they may negatively impact native fish.

O5-41: CNFISH incorporates language allowing greater flexibility than INFISH. This change was needed as it was found that INFISH was too restrictive of management actions as written, and sometimes resulted in less effective resource management than would have occurred if it were more flexible.

O5-42: Thank you for your comment. See responses P1-1 and O5-16, paragraphs 2 and 3.

Comments

O5 (Cont.)

RMP constitutes an unsupportable repudiation of applicable law and the agency's current policy.

42 *Recommendation:* BLM should include protection of lands with wilderness characteristics in the FEIS, and thoroughly analyze this issue throughout the planning process. As stated previously, the FEIS should provide for additional public comment and review prior to the issuance of a ROD.

The lands governed by the Coeur d'Alene RMP contain pristine wildlands, including those identified in a report completed by the Idaho Forest, Wildlife and Range Policy Analysis Group of the University of Idaho entitled "Idaho Roadless Areas and Wilderness Proposals" (Attachment 1). Section 201 of the Federal Land Policy and Management Act (FLPMA, 43 U.S.C. § 1701, et seq.) mandates that BLM inventory the resources of the public lands, their resources and value. 43 U.S.C. § 1711. In the land use planning process, including revision of
43 RMPs, Section 202 of FLPMA requires that BLM take into account the inventory and determine which multiple uses are best suited to which portions of the planning area. 43 U.S.C. § 1712. BLM's mandate of multiple use and sustained yield, as well as other relevant law and BLM's current guidance, provides for inventory and protection of wilderness values. **BLM is obligated to inventory for and consider a range of alternatives to protect lands with wilderness characteristics.**

1. Wilderness character is a valuable resource and important multiple use of the lands governed by the Coeur d'Alene RMP.

BLM has identified "wilderness characteristics" to include naturalness or providing opportunities for solitude or primitive recreation. *See*, Instruction Memoranda (IMs) 2003-274 and 2003-275. These values should also be identified and protected through this planning process. BLM should recognize the wide range of values associated with lands with wilderness character:

a. Scenic values – FLPMA specifically identifies "scenic values" as a resource of BLM lands for purposes of inventory and management (43 U.S.C. § 1711(a)), and the unspoiled landscapes of lands with wilderness characteristics generally provide spectacular viewing experiences. The scenic values of these lands will be severely compromised if destructive activities or other visual
44 impairments are permitted.

b. Recreation – FLPMA also identifies "outdoor recreation" as a valuable resource to be inventoried and managed by BLM. 43 U.S.C. § 1711(a). Lands with wilderness characteristics provide opportunities for primitive recreation, such as hiking, camping, hunting and wildlife viewing. Most, if not all primitive recreation experiences will be foreclosed or severely impacted if the naturalness and quiet of these lands are not preserved.

c. Wildlife habitat and riparian areas – FLPMA acknowledges the value of wildlife habitat found in public lands and recognizes habitat as an important use. 43 U.S.C. § 1702(c). Due to their unspoiled state, lands with wilderness characteristics provide valuable habitat for wildlife, thereby supporting additional resources and uses of the public lands. The Draft RMP discusses

O5 (Cont.)

the importance of large tracts of roadless habitat in Section 3.2.7. Specifically, the Draft RMP states:

> If the historic trend of habitat loss and disturbance does not slow down or reverse, then species currently listed as sensitive are likely to be listed as threatened or endangered. (3-
44 37)

Further, the Draft RMP specifically outlines the benefits of unfragmented habitat for the endangered Woodland Caribou, the threatened Canada Lynx, the endangered Northern Gray Wolf, the threatened Grizzly Bear, the threatened American Bald Eagle, and the Western Yellow-billed Cuckoo, a candidate species. The BLM has an the opportunity to address the habitat loss discussed throughout section 3.2.7 by inventorying lands for wilderness characteristics and managing these lands to maintain these characteristics.

As part of their habitat, many species are also dependent on riparian and other wetland habitats, especially during either seasonal migrations or seasons and years when surrounding habitats are dry and unproductive. Wilderness quality lands support biodiversity, watershed protection and overall healthy ecosystems. The low route density, absence of development activities and corresponding dearth of motorized vehicles, which are integral to wilderness character, also ensure the clean air, clean water and lack of disturbance necessary for productive wildlife habitat and riparian areas (which support both wildlife habitat and human uses of water).

45 Further, inventorying lands with wilderness characteristics will also provide important data on existing large blocks of habitat and how BLM can restore these blocks of habitat to better match the historic range of variability. Swanson et al. (1994) contend that managing an ecosystem within its range of variability is appropriate to maintain diverse, resilient, productive, and healthy ecosystems for viable populations of native species. Using the historical range of variability, they believe, is the most scientifically defensible way to meet society's objective of sustaining habitat. Patrick Daigle and Rick Dawson, Extension Note 07; Management Concepts for Landscape Ecology (Part 1 of 7). October 1996. http://www.for.gov.bc.ca/hfd/pubs/docs/en/en07.pdf; *citing* Swanson, F. J.; Jones, J. A.; Wallin, D. O.; Cissel, J. H. 1994. Natural variability--implications for ecosystem management. In: Jensen, M. E.; Bourgeron, P. S., tech. eds. Eastside Forest Ecosystem Health Assessment--Volume II: Ecosystem management: principles and applications. Gen. Tech. Rep. PNW-GTR-318. Portland, OR: U.S. Dept. of Agriculture, Forest Service, Pacific Northwest Research Station: pp 89-106.

46 Identifying, restoring and protecting substantial roadless areas in the lands governed by the Coeur d'Alene RMP can provide crucial benefits to wildlife.

47 d. Cultural resources – FLPMA also recognizes the importance of "historical values" as part of the resources of the public lands to be protected. 43 U.S.C. § 1702(c). The lack of intensive human access and activity on lands with wilderness characteristics helps to protect these resources.

48 e. Economic benefits – The recreation opportunities provided by wilderness quality lands also yield direct economic benefits to local communities. According to the U.S. Fish & Wildlife

Responses

O5-43: Thank you for your comment. See responses P1-1 and O5-16, paragraphs 2 and 3.

O5-44: Thank you for your suggestion. See responses O4-1 and O5-16, paragraphs 2 and 3.

O5-45: Thank you for your comment.

O5-46: Thank you for your comment.

O5-47: Thank you for your comment.

O5-48: Thank you for your comment.

Comments

O5 (Cont.)

Service, in 2001 State residents and non-residents spent $982 million on wildlife recreation in Idaho. (USFWS 2001, *National Survey of Hunting, Fishing and Wildlife-associated Recreation* - http://www.census.gov/prod/2003pubs/01fhw/fhw01-id.pdf). In addition, local communities that protect wildlands reap measurable benefits in terms of employment and personal income. For instance, a recent report by the Sonoran Institute (Sonoran Institute 2004, *Prosperity in the 21st Century West -The Role of Protected Public Lands*) found that:

> **Protected lands have the greatest influence on economic growth in rural isolated counties that lack easy access to larger markets. From 1970 to 2000, real per capita income in isolated rural counties with protected land grew more than 60 percent faster than isolated counties without any protected lands.**

These findings confirm earlier research, showing that wilderness is clearly beneficial for local economies. Residents of counties with wilderness cite wilderness as an important reason why they moved to the county, and long-term residents cite it as a reason they stay. Recent survey results also indicate that many firms decide to locate or stay in the West because of scenic amenities and wildlife-based recreation, both of which are strongly supported by wilderness areas. (Morton 2000, *Wilderness: The Silent Engine of the West's Economy*). Other "non-market" economic values arise from the ability of wildlands to contribute to recreation and recreation-related jobs, scientific research, scenic viewsheds, biodiversity conservation, and watershed protection. (Morton 1999, *The Economic Benefits of Wilderness: Theory and Practice*; Loomis 2000, *Economic Values of Wilderness Recreation and Passive Use: What We Think We Know at the Turn of the 21st Century*). All of these economic benefits are dependent upon adequate protection of the wilderness characteristics of the lands.

48

f. Quality of life – The wildlands located within the Coeur d'Alene RMP help to define the character of this area and are an important component of the quality of life for local residents and future generations. Their protection enables the customs and culture of this community to continue.

49

g. Balanced use – The vast majority of BLM lands are open to motorized use and development. FLPMA recognizes that "multiple use" of the public lands requires "a combination of balanced and diverse resource uses" that includes recreation, watershed, wildlife, fish, and natural scenic and historical values (43 U.S.C. § 1702(c)). FLPMA also requires BLM to prepare land use plans that may limit certain uses in some areas (43 U.S.C. § 1712). Many other multiple uses of public lands are compatible with protection of wilderness characteristics – in fact, many are enhanced if not dependent on protection of wilderness qualities (such as primitive recreation and wildlife habitat). Protection of wilderness characteristics will benefit many of the other multiple uses of BLM lands, while other more exclusionary uses (such as off-road vehicle use and timber harvesting) will still have adequate opportunities on other BLM lands.

50

2. BLM must consider alternatives for managing lands managed by the Coeur d'Alene RMP to protect their wilderness characteristics.

The range of alternatives is "the heart of the environmental impact statement." 40 C.F.R. § 1502.14. NEPA requires BLM to "rigorously explore and objectively evaluate" a range of alternatives to proposed federal actions. *See* 40 C.F.R. §§ 1502.14(a) and 1508.25(e).

51

O5 (Cont.)

> NEPA's requirement that alternatives be studied, developed, and described both guides the substance of environmental decision-making and provides evidence that the mandated decision-making process has actually taken place. Informed and meaningful consideration of alternatives – including the no action alternative – is thus an integral part of the statutory scheme.

51

Bob Marshall Alliance v. Hodel, 852 F.2d 1223, 1228 (9th Cir. 1988), cert. denied, 489 U.S. 1066 (1989) (citations and emphasis omitted).

"An agency must look at every reasonable alternative, with the range dictated by the nature and scope of the proposed action." Northwest Envtl Defense Center v. Bonneville Power Admin., 117 F.3d 1520, 1538 (9th Cir. 1997). An agency violates NEPA by failing to "rigorously explore and objectively evaluate all reasonable alternatives" to the proposed action. City of Tenakee Springs v. Clough, 915 F.2d 1308, 1310 (9th Cir. 1990) (quoting 40 C.F.R. § 1502.14). This evaluation extends to considering more environmentally protective alternatives and mitigation measures. *See, e.g.*, Kootenai Tribe of Idaho v. Veneman, 313 F.3d 1094,1122-1123 (9th Cir. 2002) (and cases cited therein); *see also* Or. Envtl. Council v. Kunzman, 614 F.Supp. 657, 659-660 (D. Or. 1985) (stating that the alternatives that must be considered under NEPA are those that would "avoid or minimize" adverse environmental effects).

NEPA requires that an actual "range" of alternatives is considered, such that the Act will "preclude agencies from defining the objectives of their actions in terms so unreasonably narrow that they can be accomplished be only one alternative (i.e. the applicant's proposed project)." Colorado Environmental Coalition v. Dombeck, 185 F.3d 1162, 1174 (10th Cir. 1999), citing Simmons v. United States Corps of Engineers, 120 F.3d 664, 669 (7th Cir. 1997). This requirement prevents the EIS from becoming "a foreordained formality." City of New York v. Department of Transp., 715 F.2d 732, 743 (2nd Cir. 1983). *See also*, Davis v. Mineta, 302 F.3d 1104 (10th Cir. 2002).

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Given the broad purpose of the preparation of the Coeur d'Alene RMP and the information compiled by the public regarding lands with wilderness characteristics, the range of alternatives for these lands should include alternatives to protect these lands. This range of alternatives is also consistent with BLM's FLPMA obligations to inventory its lands and resources, "including outdoor recreation and scenic values" (43 U.S.C. § 1711(a)), which by definition includes wilderness character. FLPMA also obligates BLM to take this inventory into account when preparing land use plans, using and observing the principles of multiple use and sustained yield. 43 U.S.C. § 1712(c)(4); 43 U.S.C. § 1712(c)(1). Through management plans, BLM can and should protect wilderness character and the many uses that wilderness character provides on the public lands through various management decisions, including by excluding or limiting certain uses of the public lands. *See*, 43 U.S.C. § 1712(e). This is necessary and consistent with the definition of multiple use, which identifies the importance of various aspects of wilderness character (such as recreation, wildlife, natural scenic values) and requires BLM's consideration of the relative values of these resources but "not necessarily to the combination of uses that will give the greatest economic return." 43 U.S.C. § 1702(e).

53

54

a. BLM should consider designating new Wilderness Study Areas.

Responses

O5-49: Thank you for your comment.

O5-50: The range of planning issues identified during the public scoping period indicated that while resource conservation is a goal that the public expects of BLM when managing their resources, many constituents see BLM lands as a source of renewable or non-renewable commodities or as a location to practice recreational practices that may not be promoted under the Conservation Alternative (Alternative C). To accommodate those needs while still providing a structured framework to conserve and protect natural and cultural resources, BLM developed Alternative D as a compromise. More specifics about the process of choosing the preferred alternative are given in Section 2.3.1 of the DRMP/EIS.

Alternative D has been created to provide access to resources to as diverse a user base as possible while protecting resources for future benefit. The PRMP includes measures to allow for commodity uses such as timber harvest and mining, diverse recreational opportunities such as OHV use and backcountry hiking, maintenance of fish and wildlife habitat, and protection of physical resources such as water, soil, and vegetation that benefit all residents of northern Idaho.

TT response OK but in addition it should also be pointed out that the commentors are in error when they indicate "a majority of BLM lands are open to motorized use". Action TM-D1.1.1 designates **zero** acres "open".

O5-51: The BLM planning approach focuses on goals that are common to all alternatives, while the alternatives provide different approaches to resolving user-conflicts and other issues. The RMP was prepared in accordance with the BLM handbook H-1601-1 for alternatives. The handbook states (page 21):

c. Each fully-developed alternative represents a different land use plan that addresses and/or resolves the identified planning issues in different ways.

d. Each alternative will include a different suite of potential planning decisions to address the issues. Some potential planning decisions may be common to multiple, or all alternatives.

e. Goals typically pertain to all alternatives (will not vary by alternative). Objectives, allowable uses, and management actions may (1) be consistent across alternatives, and/or (2) vary by alternative. A plan could include some objectives that vary by alternative, and other objectives that are consistent across alternatives.

O5-52: Please see response O5-51.

O5-53: Please see response O5-51.

O5-54: Thank you for your comment. Please see response O4-1.

Comments

O5 (Cont.)

While we are aware of the April 2003 settlement agreement (Utah Settlement) between Secretary of the Interior Norton and the State of Utah (in which BLM abdicated its authority to designate any additional WSAs), we maintain that this agreement is invalid and will ultimately be overturned in pending litigation.[1]

Even if the Utah Settlement is reinstated, not as a consent decree, it is illegal. The Utah Settlement is based on an interpretation of FLPMA §§ 201, 202, and 603 that is contrary to FLPMA's plain language. Section 603 did not supersede or limit BLM's authority under § 201 to undertake wilderness inventories, but rather relies explicitly on BLM having exactly that authority under § 201. Nor did § 603 in any way limit BLM's discretion under § 202 to manage its lands as it sees fit, including managing areas as § 202 WSAs in accordance with the Interim Management Policy (IMP). Every prior administration has created WSAs under § 202 and they plainly had authority to do so. This administration has such authority as well, making this a reasonable alternative deserving of consideration in this NEPA process.

The Utah Settlement is also illegal because the court in Utah lacked jurisdiction to prohibit designation of new WSAs nationwide, including in Idaho. In light of the recent ruling and subsequent action of the parties, TWS emphasizes that the BLM can and should continue to designate new WSAs in this planning process, including the areas identified with this submission. Further, if BLM fails to fulfill these obligations, it risks violating both FLPMA and NEPA, and jeopardizing the validity of this entire planning process.

55 b. BLM should also consider other management alternatives for protecting lands with wilderness characteristics.

The Utah Settlement does not affect BLM's obligation to value wilderness character or, according to BLM directives, the agency's ability to protect that character, including in the development of management alternatives.

55 BLM has not only claimed that it can continue to protect wilderness values, but has also committed to doing so. On September 29, 2003, BLM issued IMs 2003-274 and 2003-275, formalizing its policies concerning wilderness study and consideration of wilderness characteristics in the wake of the Utah Settlement. In the IMs and subsequent public statements, BLM has claimed that its abandonment of previous policy on WSAs would not prevent protection of lands with wilderness characteristics. The IMs contemplate that BLM can continue to inventory for and protect land "with wilderness characteristics," such as naturalness or

[1] In fact, the federal court in Utah revoked its approval of the Utah Settlement, stating that its approval of the initial settlement was never intended to be interpreted as a binding consent decree. Recognizing that the court's decision undermined the legal ground for the Utah Settlement, the State of Utah and the Department of Interior have now formally withdrawn the settlement as it was originally submitted. This casts serious doubt upon BLM's current policy not to consider designating new WSAs. Because the State of Utah and the Department of Interior have withdrawn their settlement and do not intend to seek a new consent decree, there is currently no binding consent decree and the BLM has not even issued any updated guidance seeking to continue applying this misguided, and illegal, policy.

O5 (Cont.)

providing opportunities for solitude or primitive recreation, through the planning process. The IMs further provide for management that emphasizes "the protection of some or all of the wilderness characteristics as a priority," even if this means prioritizing wilderness over other multiple uses. This guidance does not limit its application to lands suitable for designation of WSAs; for instance, the guidance does not include a requirement for the lands at issue to generally comprise 5000-acre parcels or a requirement that the lands have all of the potential wilderness characteristics in order to merit protection.

In an April 11, 2003, letter to Senators Craig Thomas (WY), Secretary of the Interior Gale Norton stated: "The Department stands firmly committed to the idea that we can and should manage our public lands to provide for multiple use, including protection of those areas that have wilderness characteristics." The letter also stated that "the government can identify, or 'inventory' lands … for wilderness values" and manage them through different designations which would be distinguished from the "limitation of the 1964 Wilderness Act, which only allows roadless areas greater than 5000 acres to be congressionally designated" (Attachment 5).

BLM's Arizona State Office has recently issued guidance that elaborates upon this guidance by providing for identification of lands with wilderness characteristics and development of management prescriptions to protect and enhance these values (IM No. AZ-2005-007 – Attachment 6). The recently-released Draft RMP for the Arizona Strip (excerpts in Attachment 7) includes land use allocations for lands with wilderness characteristics in every alternative and sets out protective management prescriptions (Table 2.10). This RMP also includes a detailed discussion of how BLM identified and assessed wilderness characteristics and the need for protective management (Appendix 3.D). This process is consistent with FLPMA's direction that BLM inventory for the many values of the public lands and consider ways to protect them (i.e., not all uses are appropriate in all places) in the RMP. 43 U.S.C. §§ 1711, 1712. Other RMPs that are being prepared in Arizona also include identification of lands with wilderness characteristics and include management of certain areas to maintain and enhance these values in all of the management alternatives under consideration.

Similarly, the Draft RMP for the Roan Plateau (prepared by BLM's Glenwood Springs Field Office – excerpts in Attachment 8) includes at least one alternative that manages certain areas "to protect and maintain wilderness characteristics (naturalness, roadlessness, and outstanding opportunities for solitude" as a priority over other uses (pp. 2-53 through 2-54). The Roan Draft RMP recognizes that such management is consistent with the Utah Settlement, specifically stating that while no new WSAs can be designated, BLM can pursue the "protection and management of wilderness characteristics" (p. 1-5).

56 **To ensure that wilderness values receive proper and sufficient attention as a critical aspect of land management in preparation of the Coeur d'Alene RMP, BLM must address wilderness as a separate and unique issue in the planning process in each section of the RMP.**

57 In preparing the revised RMP and accompanying EIS, BLM should clearly present management alternatives in the context of protecting wilderness character and analyze environmental consequences to that character. In the "Alternatives" section of the RMP, BLM must include

Responses

O5-55: Thank you for your comment. See responses P1-1 and O5-16, paragraphs 2 and 3.

O5-56: Thank you for your comment. See responses P1-1 and O5-16, paragraphs 2 and 3.

O5-57: Thank you for your comment. See responses P1-1 and O5-16, paragraph 2.

Protective management prescriptions are offered. Please refer to the following Actions: RC-D1.6.1 thru 1.6.4, RC-D1.8.1 thru 1.8.5 and SD-D3.1.

Comments

O5 (Cont.)

various ways to protect lands with Wilderness character in each of the management alternatives. In addition to considering designation of new WSAs, BLM should propose protective management prescriptions or other protective status (including mineral withdrawals, non-
57 motorized recreation prescriptions, ACEC designations, and prohibitions on new road construction and erection of structures such as cell towers) for these lands. The Alternatives section must also discuss the implications of each alternative for the wilderness-quality lands governed by the Coeur d'Alene RMP.

Finally, BLM must specify the "Environmental Consequences" of the resource management decisions on the wilderness-quality lands in the planning areas. This discussion should include, but not be limited to, an analysis of the cumulative impacts of other activities (including those
58 undertaken by non-federal entities) within the planning area on these unique lands. In short, in every major section of the RMP, BLM must address wilderness-quality lands and citizen-proposed wilderness areas. BLM should then take appropriate actions to protect wilderness character in the preferred management alternative.

Attachment index and references (related to Protection of Wilderness Character Section):

Attachments:

1. Idaho Roadless Areas and Wilderness Proposals.
2. *Salt Lake Tribune* August 10, 2005: "Wilderness Deal No Longer OK with Judge."
3. *State of Utah v. Norton*, Motion to Stay Briefing and for a Status Conference, September 9, 2005
4. February 12, 2004, letter to William Meadows, President of The Wilderness Society, from Assistant Secretaries of the Interior Rebecca Watson and Lynn Scarlett.
5. Letter from the Secretary of the Interior to United States Senator Craig Thomas, January 22, 1997.
6. IM AZ-2005-007.
7. Table 2.10 "Wilderness Characteristics" and Appendix 3.D "Identification of Wilderness Characteristics on the Arizona Strip" from the Draft RMP for the Arizona Strip (Arizona BLM).
8. Preliminary Draft Alternatives for Little Snake Field Office RMP (Colorado BLM). Printout is from the Northwest Colorado Stewardship (NWCOS) webpage hut posted by BLM's Little Snake Field Office.
9. Excerpts from Draft RMP for the Roan Plateau (Colorado BLM).

O5 (Cont.)

10. *Socio-Economic Framework for Public Land Management Planning: Indicators for the West's Economy*, 2005, The Wilderness Society.

Relied upon and incorporated by reference:

1. Daigle, Patrick and Rick Dawson, Extension Note 07; Management Concepts for Landscape Ecology (Part 1 of 7). October 1996. http://www.for.gov.bc.ca/hfd/pubs/docs/en/en07.pdf; *citing* Swanson, F. J.; Jones, J. A.; Wallin, D. O.; Cissel, J. H. 1994. Natural variability--implications for ecosystem management. In: Jensen, M. E.; Bourgeron, P. S., tech. eds. Eastside Forest Ecosystem Health Assessment--Volume II: Ecosystem management: principles and applications. Gen. Tech. Rep. PNW-GTR-318. Portland, OR: U.S. Dept. of Agriculture, Forest Service, Pacific Northwest Research Station: pp 89-106.
2. Loomis, J. 2000. Economic values of wilderness recreation and passive use: what we think we know at the turn of the 21st century. In:McCool, S.F.; Cole, D.N.; Borrie, W.T.; O'Loughlin, J., comps. 2000. Wilderness science in a time of change conference-Volume 2: Wilderness within the context of larger systems; 1999 May 23-27; Missoula, Mt. Proceedings RMRS-P-15-VOL 2. Ogden, UT: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. 307 p.
3. Morton, P. 1999. The economic benefits of wilderness: theory and practice. University of Denver Law Review. Volume 76, No. 2 pp. 465-518.
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6. U.S. Fish and Wildlife Service. 2003. *National Survey of Hunting, Fishing and Wildlife-associated Recreation* http://www.census.gov/prod/2003pubs/01fhw/fhw01-wy.pdf.

Noxious and Invasive Weed Treatments

Noxious weeds pose a serious threat to the ecological integrity of public lands. The BLM should make the control of noxious weeds a top priority and prevent their spread as well as reduce the potential for introduction of new invasive species. While treatment and elimination will be an important part of this goal, the BLM should prioritize efforts to prevent the initial introduction,
59 disturbance of soils, and vectors for the spread of weeds into the area. Post-hoc control efforts (with herbicides, prescribed burning, biological agents, cultural resources, and mechanical means) are challenging at best and can pose an added threat to the environment, especially when conducted on a large scale. Prevention will save millions of dollars and protect millions of acres of habitat.

Responses

O5-58: Thank you for your comment. See responses P1-1 and O5-16, paragraphs 2 and 3.

O5-59: The BLM agrees that prevention of weeds infestations is the best method of weed control. Weed prevention measures are included under all alternatives. Measures are included for washing equipment, especially those involved in ground disturbing activities. Additional focus will be placed on equipment that leaves the roadway and may spread seed into areas that are difficult to monitor and treat. Restricting OHVs to designated routes is also part of the weed prevention strategy.

Education efforts are included to provide the public with information regarding the prevention of noxious weed spread by activities including; vehicle traffic on roadways, OHVs, equestrian and pack animals, camping and hiking, as well as commercial activities.

Continued coordination with CWMAs in an effort to reduce new infestations on a regional basis, active revegetation of disturbed areas, and inclusion of measures to reduce surface-disturbance and require revegetation in permits and operating plans are all proposed as pre-infestation measures to reduce the conditions that most favor weeds.

Comments

O5 (Cont.)

Though the entire analysis lacks adequate consideration of a full range of alternatives, the section addressing noxious and invasive weeds is especially nonspecific and insufficient in its comparison of alternatives. In fact, the document does not include any sort of range of alternatives with regard to noxious weed treatments, but instead includes the same set of objectives and actions for each of the full alternatives. Moreover, the document fails to provide any details about specific treatments proposed. The BLM needs to consider and assess the
60 impacts of several different treatment plans that reflect different combinations of treatments, such as prevention, biological and cultural controls, and herbicide treatments. The development of these alternatives should be preceded by a thorough inventory of noxious weed invasions within the management area. The EIS should include detailed descriptions of proposed treatments and their likely impacts, both positive and negative. The BLM needs to specify whether any of the alternatives include aerial spraying and if so, how potential adverse impacts to water quality and native vegetation will be mitigated.

Lands and Realty

The stated intention of the preferred alternative of the Draft RMP is to emphasize retention and acquisition of lands with both commodity and non-commodity resource values, and lands that increase public access, provide recreation opportunities or consolidate federal holdings. (ES-5). Again, with regards to lands and realty, and as referenced throughout these comments, we do not feel that the preferred alternative achieves a balance between commodity production and preservation. We believe that this balance might be better achieved by designating additional lands for retention and acquisition, and by including more specially designated lands in right-of-way exclusion areas. To this end, we recommend the following changes:

On pages 2-114 and 2-115, Action LR-D1.1.4 designates 22,069 acres as exclusion areas for
61 ROWs, leases, permits, etc. Issuance of use authorizations would not be allowed in WSAs, WSR Corridors (wild designations), Windy Bay ACEC, Lund Creek RNA/ACED, Farnham Forest RNA and Hideaway Islands RNA. We recommend that Gamlin Lake ACEC also be included as a ROW exclusion area. We also recommend that areas adjacent to Forest Service roadless areas be included as a ROW exclusion area.

On page 2-115, Action LR-D1.1.5 designates only 11,274 acres as avoidance areas for issuance
62 of use authorizations. Those areas are RCAs, developed recreation sites and WSR Corridors (scenic or recreation designations). We recommend that all Areas of Critical Environmental Concern and Special Recreation Areas be included as avoidance areas of use authorizations. Specifically we request the inclusion of Killarny Lake ACEC and SRMA, Morton Slough ACEC, Rochat Divide ACEC, Kootenai Riverfront ACEC, Little North Fork ACEC, Lake Coeur d'Alene SRMA, and Gamlin Lake SRMA as avoidance areas for issuance of use authorizations. We also recommend that areas adjacent to Forest Service roadless areas be designated as avoidance areas for issuance of use authorizations.

On page 2-116, Action LR-D2.1.1 lists the criteria for those lands that will be retained and
63 acquired under the new RMP. Lands that do not meet the criteria would be available for adjustment (trade or sale). We recommend that special status species of plant and wildlife habitat, dispersed recreation land, and lands adjacent to Forest Service roadless areas be included in the criteria.

O5 (Cont.)

On page 2-117, Action LR-D2.1.2 implements a land tenure adjustment program with approximately 87,240 acres considered for retention and 9,530 acres considered for adjustment based on the criteria in LR-D2.1.1. We are pleased to see the Gold Hill area southeast of Sandpoint designated as a retention/acquisition area in the preferred alternative. The U.S. Forest
64 Service's Gold Hill trail is very popular receives extensive use, especially in the summer. The area also supports a variety of wildlife, including cougar and elk. Protecting and expanding public lands in this area will secure habitat for wildlife in the Sagle peninsula area and also provide easy access to outdoor recreation for the growing population of Bonner County, centered in the Sandpoint/Sagle area.

At the same time, we do not think the lands designated for retention in the preferred alternative are inclusive enough under the existing criteria, or when considered under our recommended changes to the criteria to consider plant and wildlife species and dispersed recreation.
65 We recommend that additional BLM properties include more land for retention and acquisition, particularly those lands indicated on Map 43 in the vicinity of the Clark Fork River delta, along the lower and upper Pack River, in the Selkirk and Cabinet ranges. Additional properties around the Widow Mountain and Rochat Divide ACECs should also be included, as in Map 43, to provide a buffer zone for these Areas of Critical Environmental Concern.

Under Goal LR-2, on page 2-116, "Provide for public ownership of lands (or interest in lands)
66 with high resource and/or public use values," a new objective should be included to protect those public lands that are released from public ownership. In the interest of protecting the natural resource values of those lands, we urge the BLM to establish direction that requires conservation easements on adjustment parcels, such as were incorporated when BLM traded parcels located in the McArthur Lake wildlife corridor to Forest Capital.

67 In general, we are opposed to any sale of BLM lands if the revenue of those sales are not directed back into conservation and purchasing private in-holdings in National Parks and other publicly-held lands. Any sale of BLM Land should include conservation easements to protect the land's natural values.

68 While the draft plan states that Kootenai County has shown interest in expanding recreation opportunities around Lake Coeur d'Alene, the need for public access on Lake Pend Oreille also is growing as the population increases, and retention and acquisition of waterfront properties should be a priority.

69 We support the BLM's efforts to co-locate communication sites, such as on St. Joe Baldy, and would like to see that practice established a matter of policy to discourage the construction of new access roads on public lands for the purpose of administrative or communication sites.

Threatened, Endangered, Special Status and Sensitive Species and Critical Habitat Designations

70 The range of alternatives with regard to management plans affecting special status species is inadequate. The number and breadth of actions proposed under the preferred alternative, and the

Responses

O5-60: BLM has modified Vegetation - Invasive Species and Noxious Weeds Action VW-1.4.1 to specify that aerial spraying will not be used as a weed-control option. The RMP specifics a range of general measures under which the CDAFO weed management program would be carried out. The range of variables associated with weed control is very broad, and requires maximum flexibility in terms of management options available to treat different types of weeds in a variety of habitats and under various conditions (drought, post-burn, pre- and post-treatment, etc.). The alternatives do not vary between alternatives because under all scenarios, all management options for noxious weeds, exclusive of aerial spraying, will be available to BLM managers. The BLM's participation in and commitment to CWMAs necessitates flexibility in noxious weed control treatments to meet our obligations. Proposed treatments under current management are specified in the Environmental Assessment for Noxious Weed Control on the Coeur d'Alene District. Any new management programs or large-scale strategies that have not been reviewed under programmatic documentation (for example, the EIS for Weed Control in 13 Western States) or proposed in BLMs Partners Against Weeds will be the subject of specific NEPA analysis and documentation.

O5-61: Appendix G identifies management direction under Alternative D, that would protect values in the Gamlin Lake Proposed ACEC (Alternative C). In the Proposed RMP/Final EIS Alternative D, BLM has added ROW avoidance designations to some BLM parcels that are adjacent to Forest Service Inventoried Roadless Areas (See Chapter 2, Recreation, Lands and Realty, and Special Designations sections). BLM made this designation only if:

1) The recreational setting for the BLM parcels was semi-primitive

2) The IPNF Proposed Land Management Plan (Forest Service 2006) prescribed management of the adjacent Inventoried Roadless Area as backcountry (5A) or recommended wilderness (1B)

3) There were no existing roads within the parcel that would be the most practical way to, or through the area in the future.

O5-62: ACECs and SRMAs are designated for a variety of reasons, some of which will not be affected by actions occurring within ROWs. For example, certain special recreation management areas are managed to retain rural and roaded-natural settings. The presence of roads or utilities within such settings would be expected and need not be avoided. Proper placement to protect resource values would be determined at the project planning level.

The proposed action is modified (See Lands and Realty Action LR-D1.1.5) to designate BLM lands adjacent to inventoried Forest Service roadless areas as ROW avoidance areas if:

1) The recreational setting for the BLM parcels is semi-primitive

2) The IPNF manages the inventoried roadless area as backcountry or recommended wilderness

3)There are no existing roads within the parcel that would be the most practical way to, or through the area in the future.

(continued on the following page)

Responses
(Continued from Previous Page)

O5-62 (Cont.): Each proposed ROW would be thoroughly reviewed for potential effects during project-level NEPA documentation. If it were found that the ROW would have significant effects on the values or functions for which an area was designated as an ACEC, the project would be redesigned or the effects would be mitigated for.

Appendix J identifies management direction that would protect important and relevant values within areas that were proposed as ACECs, but not carried forward into Alternative D. BLM analyzed each proposed ACEC and SRMA, and determined that ROW avoidance was not always a necessary or practical means for protecting values or recreational opportunities.

O5-63: Appendix J identifies management direction that would protect important and relevant values within areas that were proposed as ACECs, but not carried forward into Alternative D. BLM analyzed each proposed ACEC and SRMA, and determined that ROW avoidance was not always a necessary or practical means for protecting values or recreational opportunities.

The proposed action has been modified (See Lands and Realty Action LR-D1.1.5) to designate BLM lands adjacent to inventoried Forest Service roadless areas as ROW avoidance areas if:

1) The recreational setting for the BLM parcels is semi-primitive
2) The IPNF manages the inventoried roadless area as backcountry or recommended wilderness
3) There are no existing roads within the parcel that would be the most practical way to, or through the area in the future.

O5-64: Thank you for your comment.

O5-65: The acquisition/retention boundaries on Maps 42, 43, and 44 are simply BLM's estimation of the BLM-administered lands which meet the criteria. The criteria would be considered under any proposed acquisition or adjustment, not just the estimation boundaries.

O5-66 (Cont.): BLM institutes conservation easements where possible, but cannot commit to requiring such an agreement on every sale. If warranted conservation easements would be placed on lands leaving federal ownership. This would be determined during project level planning.

O5-67: This can not be addressed in the RMP. It is regulated by BLM policy at the national level. Also see response O5-66.

O5-68: Public or administrative access is included as an retention/acquisition criterion under Alternatives B, C, and D. This would allow for acquisitions for public access to Lake Pend Oreille.

O5-69: The intention of co-location is to minimize disturbance this is addressed in LR-B1.1.3, LR-C1.1.3 & DR-D1.1.3.

O5-70: Section 2(c) of the Endangered Species Act declared the policy of Congress that all Federal departments and agencies shall seek to conserve endangered species and threatened species and shall utilize their authorities in furtherance of the purposes of this Act.

Alternatives that would not conserve the species would not satisfy the law. Alternative D includes conservation measures that were mutually developed and agreed upon by the BLM and the FWS.

Comments

O5 (Cont.)

70 lack thereof proposed under alternatives B and C, is such that the preferred alternative is not really comparable with the others. This is not the type of full range of reasonable alternatives required in NEPA analyses, such that the decision-maker can make a reasoned and informed decision.

71 The BLM should establish goals to ensure the protection and recovery of threatened, endangered, sensitive and special status species. BLM should designate critical habitat for endangered, sensitive, threatened and special status species. These habitat areas should be managed with the species survival and recovery as the highest and most valuable use, as per the Endangered Species Act. As the DEIS is written right now, the preferred alternative would need to be adopted in order to ensure that these goals are established. We recommend that the BLM more fully integrate protection and recovery efforts into a full range of alternatives by considering the following:

72 As numerous studies, including BLM research and analysis, have found dredge mining, logging, road building, and livestock grazing have all had significant negative impacts on native fish and their habitats. Migration barriers are also a significant problem. The new RMP must address all of these problems and provide guidance for rectifying the situation to improve habitat.

73 The RMP should also address habitat fragmentation in aquatic environments of the Coeur d'Alene Resource Area. This should include requiring removal of man-made migration barriers or requiring adequate fish passage structures on all new and existing dams, diversion dikes and culverts. Since elevated stream temperatures pose a major thermal barrier to coldwater-dependent species, the RMP should establish temperature guidelines and prohibit any activities that are likely to result in increased stream temperatures.

74 Siltation from road building, logging, grazing and mining smothers spawning beds and fills in pools that serve as critical overwintering habitat for fish, and alters macroinvertebrate populations that serve as an important food sources for fish. The new RMP should strictly limit such activities in known spawning areas, and prohibit them in areas that are highly susceptible to landslides. Standards should be established to ensure that reasonable turbidity levels are not exceeded and adequate numbers of pools are maintained.

75 Competition from, and interbreeding with, non-native species such as brook trout are another major factor in sensitive fishery declines in some areas. The new RMP should prohibit the stocking of competitor species, and establish management guidelines that encourage control or elimination of competitor species. Non-native fish should not be stocked in rivers, streams or lakes that contain fish, amphibian and other animal and plant species that are federally protected.

76 The RMP should also require increased public education. This should include information to the public on the presence of T, E & S aquatic species and how to properly identify and release them.

77 The BLM should also consider special management direction for areas that may provide habitat for sensitive wildlife species. Important migration corridors between summer and winter ranges for wildlife should be identified and receive a high priority for protection and improvement.

O5 (Cont.)

77 Minimizing barriers to wildlife migration and movement by designating important travel corridors with specialized management criteria could significantly benefit sensitive terrestrial species.

78 In the previous MFP, the BLM identified some of the sensitive wildlife species it desired to increase and protect. We request additional information and an assessment of those key species identified for which BLM has established management goals.

Minerals

79 The DEIS does not analyze a full range of alternatives regarding the future management direction of mineral leasing and development. The alternatives are remarkably similar in this area, each leaving a significant number of acres open to mining and neglecting issues related to restoration and protection from future environmental damage from mineral development. The issue of mineral development is a particularly critical one given the area's history of mining and the environmental devastation that has ensued. The BLM needs to consider alternatives that truly do emphasize environmental restoration and protection by closing more acreage to mineral development.

80 The DEIS does a poor job of comparing the impacts of mining on water quality for each of the alternatives. It is not enough to state that alternatives A, B and D would have more impacts than alternative C. The DEIS needs to be much more specific about the negative impacts associated with leaving acreage open to mining and the positive impacts associated with withdrawing acreage from mining.

81 Regardless of which alternative is adopted, the BLM has a responsibility to take steps to restore the environmental damage that has resulted from mineral development in the region, especially that relating to water quality. We strongly recommend that the BLM expand the Lower Salmon River withdrawal to include other sensitive areas within the Coeur d'Alene Resource Area. We
82 also recommend that the BLM buy out mining claims in sensitive areas, such as those containing sensitive or threatened species. The BLM should conduct surveys and assessments of abandoned
83 mines for environmental risks and should prioritize treatments. Finally, the BLM needs to be
84 vigilant about potential water contamination from future proposals, heavy metals, and acid mine drainage.

Attachments

We have attached the following documents to supplement our comments:

1. Idaho Roadless Areas and Wilderness Proposals
2. *Salt Lake Tribune* August 10. 2005: "Wilderness Deal No Longer OK with Judge."
3. *State of Utah v. Norton,* Motion to Stay Briefing and for a Status Conference, September 9, 2005.

Responses

O5-71: See response O5-70. Goal SS-1 reaffirms BLM policy to conserve listed species and the ecosystems upon which they depend (Manual 6840.06A1). This goal applies to all alternatives. Goal SS-2, which also applies to all alternatives, reaffirms BLM policy to implement management plans that conserve candidate and sensitive species and their habitats and shall ensure that actions authorized, funded, or carried out by the BLM do not contribute to the need for the species to become listed (Manual 6840.06C and E). Only the FWS can designate critical habitat.

O5-72: Provisions to ensure that these types of activities do not affect listed fish species or their habitats are contained in the conservation measures listed under the preferred alternative and by specifying restrictions on actions occurring in RCAs under CNFISH. These measures have been prepared in cooperation with the USFWS, and Section 7 consultation has been initiated.

O5-73: BLM does not manage any dams in the CDAFO. Fish passage at road crossings is addressed in CNFISH, RF-5. Thermal pollution is addressed in CNFISH by ensuring that adequate canopy cover remains in riparian zones to provide adequate shading. Establishment of temperature guidelines for streams is outlined in the RMO section of CNFISH (please see INFISH/CNFISH crosswalk in Appendix D of the DEIS).

O5-74: CNFISH requires that RCAs be established around landslide-prone areas as well as streams, lakes and wetlands. Activities in RCAs will be designed to enhance, restore or maintain the physical and biological characteristics of the RCA (see RCA-1). Actions that may degrade the riparian area or aquatic habitat, or delay or prevent attainment of RMOs (including those actions that would cause siltation) are subject to the CNFISH Standards and Guidelines. We abide by the State of Idaho standards for turbidity when we implement projects that have the potential to cause turbidity, such as culvert replacements or instream restoration. Objectives for pool frequency, quality and size are now included in the CNFISH RMOs.

O5-75: The BLM does not manage any fish or wildlife species, only their habitat that falls within public land boundaries. The wildlife and fish are under the jurisdiction of Idaho Department of Fish and Game (IDFG), therefore we do not control stocking or removal of fish.

O5-76: Increased public education is proposed for a variety of resource areas and under a number of actions, including FW-D2.1.2 (see Appendix I, Item 15), SS-B1.1.5, SS-C2.5.9, CR B1.2.5, RC-D1.2.10, RC-D1.3.7, and SD-A4.2. TT - make sure to update this when we decide what to do about Appendix I.

O5-77: Goal SS-2 and Goal SD-2 with all accompanying objectives and actions under all alternatives are intended to provide special management direction for habitats occupied by sensitive species.

Neither the BLM nor the Idaho Fish and Game have detailed mapped migration corridors between summer and winter ranges. However, we examined a broad-scaled map prepared by the Rocky Mountain Elk Foundation. BLM also considered findings in Servheen, Waller, and Sandstrom (2001, Identification and management of linkage zones for grizzly bears between the large blocks of public

(continued on the following page)

Responses
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O5-77 (Cont.): land in the northern Rocky Mountains, US Fish and Wildlife Service) and the draft EIS for the Northern Rockies Lynx Amendment (2004) identified important travel corridors for grizzly bears and Canada lynx. Many of these travel corridors do not have BLM public lands within them.

O5-78: A complete list of BLM Idaho sensitive species is available on the internet at http://www.blm.gov/nhp/efoia/id/data/03_im/IMID2003-057.pdf. Trends of sensitive species in the planning area are described in Chapter 3 of the Proposed RMP/Final EIS. More information on individual species is available on the internet at http://www.natureserve.org/explorer/. Objectives SS-2.1 (aquatic, riparian, and wetland), 2.2 (cavity nesting species), 2.3 (fisher), and 2.4 (wolverine) apply to sensitive wildlife species.

O5-79: The potential for leasable minerals occurrence (fluid and solid) is very low to zero in the CDAFO (TT 2005b) and leasing is a discretionary act therefore the need to recommend closure of specific areas to leasing is not considered imperative. The Proposed RMP does present alternatives which "emphasize environmental restoration and protection". Alternatives C and D have additional lands withdrawn from mineral entry and impose leasing stipulations (NSOs and CSUs) on the greatest amount of BLM lands. The Proposed RMP highlights protection of resources in critical areas via NSOs and CSUs based on special designations, cultural concerns, visual concerns, and/or special status species and their habitat. This management approach allows protection of critical areas and flexibility to respond to future, unforeseen conditions.

O5-80: We feel the first and second paragraphs of the *Impacts from Minerals Management* on Water Resources adequately address the possible impacts mining could have on Water Resources. Levels of protection are based on Federal, State, and local laws and apply equally to all alternatives and all forms of activity. Protection of water resources is based on these laws and management prescriptions developed during the RMP. Protective/mitigation measures are implemented on a case-by-case scenario. In order to get specific about the impacts from mining on water resources we would need the specifics of each proposed mineral operation over the next 20 years. Our effort to predict the level of mineral activity the CDAFO could see is provided in Appendix H, Reasonably Foreseeable Development Scenario. These impacts could occur on any lands open to mining therefore the only comparison between the RMP alternatives is the amount of lands available for mineral activities.

O5-81: Salmon River withdrawal is outside the scope of this RMP.

O5-82: BLM does not 'buy out' mining claimants. If it is determined that an area warrants withdrawal from the mining laws, then a validity determination is performed on mining claims with valid existing rights within the area to be withdrawn.

O5-83: Please see all actions under Objectives SE2.1, SE2.2 and SE2.3 for proposed action relative to these issues.

O5-84: Thank you for your comment.

Comments

O5 (Cont.)

4. February 12, 2004, letter to William Meadows, President of The Wilderness Society, from Assistant Secretaries of the Interior Rebecca Watson and Lynn Scarlett.

5. Letter from the Secretary of the Interior to United States Senator Craig Thomas, January 22, 1997.

6. IM AZ-2005-007.

7. Table 2.10 "Wilderness Characteristics" and Appendix 3.D "Identification of Wilderness Characteristics on the Arizona Strip" from the Draft RMP for the Arizona Strip (Arizona BLM).

8. Preliminary Draft Alternatives for Little Snake Field Office RMP (Colorado BLM). Printout is from the Northwest Colorado Stewardship

9. Excerpts from Draft RMP for the Roan Plateau (Colorado BLM).

10. *Socio-Economic Framework for Public Land Management Planning: Indicators for the West's Economy*, 2005, The Wilderness Society.

11. Map of BLM Parcels Adjacent to USFS Roadless Areas.

O6

Kinnikinnick Chapter Of The Idaho Native Plant Society

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April 14th, 2006

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RE: ***Draft Coeur d'Alene Resource Management Plan and Environmental Impact Statement***

We would like to thank you for the opportunity to comment on the Draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS) for the Coeur d'Alene district. The ***Kinnikinnick Chapter of the Idaho Native Plant Society*** advocates for the preservation of native plants and their habitat. As our chapter is based in Sandpoint, hence our comments may be more detailed in regards to the Bonner County component of this plan.

In general we applaud many of the general conservation measures that the BLM is suggesting to adopt in the preferred alternative. Some of the most important ones, which should be retained in the final plan are mentioned below in our detailed comments. Many of the specific proposed actions or standards contained in this plan are well thought through and, if implemented, will enhance forest health and provide protection for native plants and native plant habitat on lands managed by the BLM under this plan. Having said that, we have numerous concerns about plan details, options and choices made in the "preferred alternative" (D), which we would like to see addressed in the Final RMP and EIS.

1 One major concern is that our ability to comment is limited by the lack of specific information in this draft RMP. And this RMP is limited in its ability to make many specific recommendations in regards to land use decisions by this same missing information. Missing from the plan are detailed maps or analysis of stand composition, vegetation type or habitat type. Currently the draft RMP does not give the percentage of timber harvest projections by area, only by total zone. The explanation, which the BLM offered at the public meeting in February, for the lack of these details, was that the maps were meant to be a "snap-shot" taken from 38,000 feet. We would respectfully suggest that a closer look at the

Responses

O6-1: This document is not intended to provide site-specific documentation. It is intended to provide a framework under which site-specific projects could occur. It is at the project level that the type of data and documentation that the commenter is requesting would be generated.

BLM agrees that there is a great need to be as strategic as possible in determining which areas will be subjected to treatments. Since conditions may change over the life of this plan (for example, drought could increase or decrease, or bark beetle infestations could increase or decrease, etc.), this strategy is to develop a flexible management framework that will allow BLM to apply its resources where they will have the greatest effect over the life of this plan.

Comments

O6 (Cont.)

ground conditions might provide more adequate information on which to base important, site specific, decisions. The strategic nature of this plan would benefit from this ground level detailed look.

1 The need for this specific information is underscored by the fact the even under the most "aggressive" options outlined in Alt D (the so-called "preferred alternative") the BLM will only be "treating" for forest health 10% of the land it administers in the next 15 years. (See page 2-137) The fact that 90% of the land will not receive treatments designed to improve forest health suggest the very great need to be as strategic as possible in determining which areas are suitable for project planning.

2 BLM Manual 6840 directs the BLM's policies regarding special status species, including plants. This includes Federal T/E, Proposed and candidate species, sensitive species and state listed species. The draft RMP does not address the full range of plant species just cited above in a manner adequate to determine whether or not the preferred alternative meets the BLM's own obligations.

3 In regards to the development of Alt D, the so-called "preferred alternative", the BLM has stated that it represents a compromise between the "use" alternative (B) and the "conservation" alternative (C). In very many cases the "compromise" represents a decision to adopt strategies or goals that are so close to the "use" end of the spectrum that compromise seems to be a misused term. Timber production, acres and trail miles open for OHV use, the proposed creation of ACECs and the withdrawal of mining rights are the most extreme examples of this. We will cite specific details in our detailed comments. But, in general, the range of possibilities considered did not include any true "middle" ground". We would urge that the Final RMP/EIS address these scales and find compromises between "use" and "conservation" that are truly more reflective of the need to balance resource extraction and conservation. In many cases, they are not mutually exclusive and compromise can be found with more precise planning.

Comments on Specific Plan Components

Listed below are comments we would like to make on specific plan components. Page numbers or paragraph details are provided for your convenient reference:

4 On Page 1 –7 the BLM states: "Analysis of the effect of global warming on vegetation composition and the value of forests as a reservoir to sequester carbon is beyond the scope of the RMP" And at the public meeting in February in Sandpoint the BLM stated that the BLM "Does not manage global warming." We would respectfully point out that while the BLM may not be able to manage the entire problem, planning for the impacts of global warming would be prudent; otherwise, the RMP will not be a document capable of guiding strategic decisions as these impacts are felt. The need to address carbon sequestering is but one example. Another example is the impact of global warming on the lifecycle of the Pine Bark Beetle, which is well documented. As we feel the impacts from global warming, the subsequent impact from this one insect is potentially very high and should be addressed. The BLM's planning should take into account these interlinked phenomena otherwise on the ground actions will not be able to address the real world situation.

O6 (Cont.)

5 **Vegetation -- Forests And Woodlands**
VF-D1.2.2 - should incorporate actions suggested in alt C: "conserve and restore aspen, birch, and cottonwood stands." These deciduous trees are among the ones whose habitat faces some of the greatest threats.

6 **Vegetation -- Invasive Species and Noxious Weeds**
VW 1. 4. 2 - This action states "when necessary, revegetate treated areas in areas vulnerable to weed invasion." We would suggest that the BLM should *aggressively* pursue revegetation with native plants (not only when its deemed *necessary* but as a standard since this is the only way to assure that weeds won't return after timber harvests or other "treatment".)

Special Status Species Section

7 It is surprising that some of the actions proposed in Alt D were not part of Alt C. The rationale that they were based on "new information" seems at odds with the fact that the majority of added actions are based on long-established regulations or practices (e.g.: "section 7 consultations" or "project level inventories" or "utilizing BMPs"). In general, we urge that all of the considerations included in Alt D, from **page 2-22 through 2-27,** be included in the final DEIS.

8 **On page 2-27, SS-C1.1.2** states an action to: "recommend withdrawal of public lands within 300 feet of stream beds from mineral leasing and location to protect bull trout habitat." In the following section the same recommendation is made in order to protect white sturgeon habitat. Riparian zones are very sensitive and are significant areas for native plant habitat, especially for sensitive plant species. Since these same actions would benefit native plants and their habitat we recommend that they be included in the final draft.

9 **On page 2-59, Alt D, SS-B2.3.1** states "implement actions under FW-D2.2." For the sake of clarity we would recommend that the final draft be more explicit regarding the actions to be taken under this section.

10 On the same page, **SS-C2.3.3** states "identifying mid-seral forest stands that could be brought into old-growth conditions in the near future, and use appropriate silvicultural activities to encourage this development." The next section states: "retain stands of late-seral forests and promote their long-term sustainability." These actions are missing from Alt D. We believe that both of these actions should be incorporated in the final draft.

11 On the same page in the next section under Alt C, it states: "implement the selection guidelines for reserve trees as offered by Oregon OSHA and others." It is unclear why regulations from a state other than Idaho would apply here. However, before making recommendations on whether or not these guidelines should be implemented we would need to see more details about them, which were not available in any of the appendices.

Responses

O6-2: Every effort was made to develop a plant list identifying all of the special status plant species in the CFO (see references in Table 3-13). A programmatic Biological Assessment has been created for all federal T/E species, and indicated no effects on those species. Site-specific inventory would refine species lists at the project level.

O6-3: A compromise that would appear to be balanced by all user groups is not possible for every resource area. Some actions proposed under the preferred alternative may fall closer to those proposed under the "commodity" alternative, while others may fall closer to those proposed under the "conservation" alternative. BLM asks that the commenter review the entire alternative for balance, and also realize that each alternative allows for flexibility in the way that actions are carried out during implementation.

O6-4: Although research suggests that there is still uncertainty to impacts from global warming (fertilization effect of CO_2 and increased water use efficiency), BLM implements and will continue to implement silvicultural practices to mitigate the effects of climate change and the predicted northward migration of tree species. These practices are described in Chapter 3 (Section 3.2.5) and Chapter 4 (Section 4.2.4.2).

O6-5: Action VF-D1.2.4 is the same as Action VF-C1.2.2, it is just out of line due to the differences in the way the two alternatives are written.

O6-6: Thank you for your comment. BLM recognizes the importance of native plants in a weed resistant plant community. Native plant seed will be used preferentially for revegetation efforts. Approved non-natives will be considered when native seed is not available, not practical, or does not meet management requirements.

O6-7: The information that BLM used in developing Alternative D of the Draft RMP/EIS, that were not available during development of Alternatives B and C, included conservation measures that are now specified in the Biological Assessment (BA) on the Coeur d'Alene Resource Management Plan [Emerald Empire Management Framework Plan (MFP)] (BLM 2006). BLM was in the process of developing this BA, simultaneous with developing the alternatives for the Draft RMP/EIS. The referenced section of Alternative D has been modified in the Proposed RMP/Final EIS to reflect measures as they appear in the final version of this BA. Alternative D was also modified from the Draft RMP/EIS to incorporate conservation measures outlined in the Biological Assessment of the Northern Rockies Lynx Amendment (USDA Forest Service 2005). This recent document identifies the preferred alternative for amending a number of BLM and Forest Service land use plans, to include the Emerald Empire MFP, to protect the subject threatened species. BLM made other minor changes to address concerns that USFWS identified during consultation.

O6-8: CNFISH provides buffers along waterbodies with adequate protection for various BLM resources and uses.

O6-9: All actions listed under Objective FW-D2.2 would be implemented under Action SS-B2.3.1.

O6-10: Action SS-B2.3.1 implements actions under FW-D2.2. Action FW-D2.2.8 says When consistent with goals and objectives in the forest vegetation section, identify mid-seral forest stands that could be brought into late-seral conditions in the near future, and use appropriate vegetation treatments to encourage this development.

(continued on the following page)

Comments

O6 (Cont.)

Special Status Plants Section

12 **SS-D2.5 through D.2.5.4** - these five paragraphs are the same across all four alternatives and involve inventory projects, planning activities or cooperative participation. All these actions are critical when dealing with special status plants. It is very important that the final draft include these actions.

13 **SS-D2.5.5 through SS-D2.5.9** - the specific activities outlined in these six actions are found in both Alt C and Alt D. Because of the benefits that they accrue to special status plants it is imperative that final draft include each of these items.

14 **SS-C2.5.10** - this action (which does not appear in Alt D) states: "for new mineral leases within or adjacent to special status plant species, specify a no surface occupancy stipulation." While we recognize that mining rights cannot be withdrawn from every acre, we feel that special status plants represent habitat which requires this action and that this should be included in the final DEIS.

15 **SS-D2.5.10** - this action states: "in cooperation with IDFG Conservation Data Center (CDC), USFWS, and other partners implement conservation measures for all threatened and endangered plant species." This action, which is required both by law as well as internal BLM policies, should have been present in every alternative; obviously the final the EIS needs to include this action.

16 Native plant species that are Idaho State "sensitive" should receive equal protection as well.

17 **Pages 2-62 through 2-71** contain a list of 30 actions found only in Alt D. Most of these are "commonsense" activities that are either mandated by law, or contained within best management practices, and including them provides appropriate directions for managing habitat for special status plant species. Clearly, all 30 of these actions need to be in the final DIS.

18 **On page 2-72** item 1) states "avoid issuing commercial firewood cutting permits in suitable habitat and riparian forests. It permits are issued, insure that such activities are consistent with the long-term maintenance of mature riparian forests." If in fact commercial firewood cutting permits are to be *avoided*, then the "conditions" under which they would be issued should be a moot point. They should not be issued.

19 Continuing on in this section item number 2) deals with "retained forest structure on the edge of riparian areas with known populations or in suitable habitat for shading these wetland areas" that goes on to "allow commercial timber management projects or firewood cutting when negative impact to suitable habitat can be avoided or minimized." It is hard to believe that the BLM will be able to fulfill its obligations to protect special status plant species in sensitive wetlands by allowing commercial timber management under any conditions. We would ask that this be changed so the commercial timber projects are not allowed in this habitat.

Forestry And Woodland Products

20 **Page 2-80** - each of the four alternatives determines an acreage for commercial forest products from vegetation treatments designed to improve forest health". If these projects are truly designed with forest health as the primary reason for actions to be taken, and as the primary consideration in determining what treatment methods will be used, and if forest health provides the primary guidance for how projects are designed we would be supportive of an alternative that designates 8200 acres for such projects. However, we find it perplexing that the so-called "conservation" alternative would only treat 1200 acres and that the so-called commodity alternative would treat 9600 acres if the goals were truly forest health. The clear implication here is that resource extraction, not conservation, is the primary factor in determining acres to be treated.

O6 (Cont.)

20 This leaves us asking several questions. What happens to the forest health of the remaining 90 to 98% of untreated acres under any of the alternatives? If the preferred Alt D is a "compromise" between commodity extraction and conservation then why are the targeted treatment acres so much closer on scale to those suggested by the commodity alternative? More importantly, if forest woodland products are to be produced with forest health in mind the range of alternatives presented should take into account a greater number of treatments options, such as non-commercial thinning, prescribed burns, wildland fire management, stream restoration, re-vegetation and so on. The acreage targets as well as square board feet of timber production would not be the only variables. We would urge the BLM to review the options available to them to achieve both wood production as well as forest health and present these options to the public in such a manner that they may be deliberated on prior to issuing the final EIS.

Recreation

21 **Gamlin Lake** - pages 2-94 through 2 -97 cover the proposed Gamlin Lake SRMA. We are concerned that greater development of Gamlin Lake as a recreational site, would not adequately protect native plant habitat of this area, also proposed as an ACEC. And, if in fact part of this

22 "expanded Gamlin Lake SRMA" unit is really comprised of land situated several miles away on the south side of Gold Hill, then this is not contiguous with the BLM lands surrounding Gamlin Lake, and should be listed as a separate SRMA in order to clarify the development proposals.

23 (See RC-D1.4.5) specifically RC-D1.4.1 mentions "providing improved road access to develop the recreation facilities". Currently, a county maintained paved road leads to a well-developed parking lot at Gamlin Lake. It is unclear what further improvements are needed or suggested by this section. These pages also suggest the possibility of improvements to a boat launch at this

24 location. We strongly urge that any activity involving boat usage of Gamlin Lake, include actions which would prevent and/or control the spread of Eurasian milfoil.

According to the Bonner County weed supervisor, over 40% of Gamlin Lake is already infested with Eurasian milfoil. The BLM needs to address the problem of this current infestation and suggest possible remedies. Nowhere in the entire draft EIS is the problem of Eurasian milfoil addressed for Gamlin Lake or any other waters controlled by the BLM. This is a serious deficiency of the draft EIS which needs to be corrected before the final EIS is released.

25 The current use of Gamlin Lake by boats powered with electric motors presents an unnecessary risk. Eurasian milfoil is a noxious, invasive species that readily reproduces when small parts of the plant are broken or chopped off. Use of motors in such a small and heavily impacted lake is a recipe for continued problems. All motorized use of this lake should be banned immediately, and remain in effect until the Eurasian milfoil problem is brought under control.

Other preventative steps can also be taken to reduce potential additional introduction of Eurasian milfoil. Some of the things which can be done, include: limiting boat access to one developed dock area instead of allowing dispersed access, posting educational signs and information on Eurasian milfoil, setting up barriers along the road to prevent vehicles from driving onto the sensitive shoreline and to limit the launching of watercraft.

Responses

O6-11: The 1995 *Oregon Guidelines for Selecting Reserve Trees* was updated (2005) to a *Field Guide for Danger Tree Identification and Response* (http://www.cbs.state.or.us/osha/pdf/pubs/reserve_trees.pdf). The State of Washington's *Guidelines for Selecting Reserve Trees* (1992) was updated in 2005 (http://www.lni.wa.gov/ipub/417-092-000.pdf). The 1995 Oregon and the 2005 Washington guidelines are very similar to one another. The BLM is not aware of guidelines developed for Idaho.

O6-12: Thank you for your comment.

O6-13: Thank you for your comment.

O6-14: This action does appear in Alternative D; SS-D2.5.10, item 35b. NSO stipulations will be implemented on mineral actions where such actions could affect threatened and endangered species. All proposed actions will be reviewed for such effects on the project level.

O6-15: Action will be included in all alternatives in the FEIS.

O6-16: Plant species designated as BLM Sensitive are given the same level of protection as a federal candidate species (BLM Manual 6840). Plant species designated by the Idaho Native Plant Society as "State Sensitive" generally are incorporated into the Idaho BLM Sensitive Plant Species list as Type 2, 3, or 4, depending upon rarity and threat levels. However, in order to be included on the Idaho BLM Sensitive Plant list, the species must be known to occur on BLM lands, or be very likely to occur there, though not yet documented.

O6-17: This list provides conservation measures for federal T/E plant species which were developed in consultation with the USFWS. Any alternative that ultimately becomes the RMP will contain appropriate conservation measures to protect listed plant species, in compliance with the ESA.

O6-18: This action (SS-D1.3.2) has been changed to state that BLM will not issue commercial firewood permits within riparian forests.

O6-19: This action refers to allowing commercial timber projects in the **vicinity** of suitable habitat for water howellia when it can be shown that such projects would have no effects on the species. Each project would be subject to implementation level NEPA analysis.

O6-20: Alternative C is the Minimal Active Management/ Preservation emphasis alternative. The theme for this alternative was to make minimal impacts via minimizing active management of resources. Hence, under vegetation management, the direction would be to only treat areas where disturbance has already occurred. The 1,200 acres is an estimate based on past occurrence of wildfire.

Alternative B emphasizes commodity production. Thus, under forest vegetation, even though the goal is still to restore forest health, the treatment acres were maximized with the intention of maximizing forest products. The goal for forestry and woodland products, which applies to all alternatives, is to provide timber to help meet local and national demands for wood products while protecting the natural component of the environment.

Alternative D is a balanced approach, but not a midpoint between B and C. Some of the resource protective measures under this alternative are more restrictive than under Alternative C, to minimize impacts from such things as greater active management of forest vegetation.

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Responses
(Continued from Previous Page)

O6-20 (Cont.): Alternative D also took into account mid-level estimates of future funding and manpower.

Unfortunately, a realistic approach to managing BLM lands through treatment actions or using wildland fire makes it impossible to manage all acres. It would be unrealistic to assume funding levels and manpower would be available for such a fete. Thus, under Alternative D, approximately 10% of the available non-withdrawn forested lands could be treated over the next 15 years. If this were to continue beyond the 15-20 year life expectancy of the plan, then all available forested lands on the CDAFO area could be treated over the next 150 years ±.

Numerous treatment options are available for implementing forest health and fuels reductions treatments. These options range from the use of a wide range of silvicultural treatments including reforestation, prescribed burning to the use of wildland fire (VF-B1.2, C1.2 and D1.2 and Objectives WF-B1.3, C1.3, D1.3, B1.4, C.1.4 and D1.4). The actions described in the alternatives have been developed to give BLM forestry and fuels staff the flexibility needed to respond to an altered landscape, evolving resource needs, and a changing regulatory environment.

Impacts resulting from not treating forest vegetation are described in Chapter 4.

O6-21: As an SRMA, Gamlin Lake is subject to management under which increased use is accompanied by increased management. Under all alternatives, conservation measures identified to protect special status plants would be implemented, as would INFISH/CNFISH measures to protect riparian and wetland vegetation.

O6-22: Proposed Special Recreation Management Areas (SRMAs) are delineated in accordance with BLM guidance contained in H-1601-1 Land Use Planning Handbook, Appendix C. There is no requirement that SRMAs be comprised of contiguous tracts of land. If that were the case, all our proposed SRMAs except for Huckleberry Campground would have to be segmented into multiple areas that would make activity level planning very redundant, cumbersome and administratively unmanageable. The parcels we have grouped share a distinct, primary recreation tourism market, serve most of the same people, produce similar experience and benefit outcomes and have similar setting characters (ROS = a combination of both rural and roaded natural). Specific recreation development proposals are made at the activity planning level. In the case of Gamlin Lake a current activity plan is in place. Actions contained in it for the currently configured area remain consistent with proposed RMP actions. Consequently, plan revision in accordance with action RC-D1.4.5 is needed so activity specific management direction can be incorporated for the lands that would be added to the management area.

O6-23: Action RC-D-1.4.1 is a prescription of setting characteristics that would commonly be appropriate, consistent, or desirable for rural and roaded natural areas and is not a development proposal. In the case of Gamlin Lake, a characteristic developed facility with improved road access already exists and it is desirable that it be retained. If future activity level planning determines that other facilities were required, the provision of road access would be consistent with the managed setting.

O6-24: BLM is strongly committed to containing any invasive species, including Eurasian milfoil. Installation of a boat launch at Gamlin Lake would be preceded by the appropriate level of NEPA documentation, which would consider the projects potential to contribute to weed spread, and would propose measures to mitigate for this effect.

O6-25: We agree that Eurasian milfoil is a serious situation particularly in a lake the size of Gamlin Lake. Presently we are working with the Bonner County Weed Superintendent to determine whether the plant exists in the lake and to what extent.

We also agree that electric and outboard motors are one mechanism for spreading milfoil plant parts. However, BLM does not have the authority to regulate the use of boats or engine types on Gamlin Lake. Boat usage on Gamlin Lake is regulated by Idaho Fish and Game (IDFG) and Bonner County. Presently there is dual regulation on the lake. If a person is fishing from a boat, they are required to use only an electric motor by IDFG. Bonner county regulations state no jet skis are allowed and place a limit on outboard engine size of 10 h.p. or less for all boats.

Boat access to the lake is presently provided at one location at an undeveloped launch along Glengary Bay Rd. This launch is not on BLM land and is not administered by BLM, therefore BLM has no authority to erect barriers along this road to prevent or limit launching access.

Comments

O6 (Cont.)

26 In order to address the problem of Eurasian milfoil, we would urge the BLM to coordinate with the county in developing projects which might be funded through the state if Idaho's recent allocation of $4 million for Milfoil control. We would like to be kept informed of any activities that the BLM takes in regards to Eurasian milfoil, in general as well as at Gamlin Lake.

27 Because Gamlin lake areas is habitat for several special status plant species we would like to suggest that any projects proposed for this area go through the process of developing an Environmental Impact Statement.

Transportation and Travel Management

28 We are extremely disappointed that not one of the alternatives addresses the problems associated with OHV travel in any serious fashion. Dale Bosworth, chief of United States Forest Service, has identified unmanaged recreation (along with noxious weeds) as one of the four greatest threats to our public lands today. The strongest action proposed by this RMP to contain this threat, is found in Alt D, where a mere 631 acres (less than 1% of the 96,000 plus acres of land covered by this plan) would be closed to motorized travel. From physical disturbance, soil compaction, habitat fragmentation, to the spread of noxious weed seeds, and the pollution caused by unburned fuel - the threats of motorized travel to native plant habitat are many.

Simply put, the BLM needs to do an adequate inventory of both sensitive plant habitat as well as land suitable for motorized recreation in order to make wise management decisions about where motorized travel should, or should not, be allowed. The results of this inventory data need to be made available to the public for review, comment and further input prior to the development and release of the final the EIS.

29 In addition to determining closures, this study should provide the basis for determining whether or not the BLM has any basis to suggest an increase in roads and trails suitable for OHV from 122 to 175 miles. From this draft document in its appendices we see no materials to support this increase and strongly urge against it.

Lands and Realty (LR) Section

30 **On page 2-114** the action listed under Alt D. discusses designated rights-of-way corridors across the planning area. Evaluation of these corridors is impossible without further information about and maps of their location, and the habitats that they would impact. The draft EIS does not adequately address these questions.

31 **On page 2-116**, the actions suggested by both Alt C and Alt D, involve adjusting and consolidating public land ownership to protect resources. The difference between the two alternatives is that C protects and promotes *low-impact* uses whereas D would simply promote "uses". We support the approach in C.

32 **LR-D.1.1.1** references designated "rights-of -way" corridors, as updated in 2003. But detailed information about the locations of these corridors is not to be found in the draft RMP. More information is needed.

33 **In LR-D1.1.5** we are concerned that Alt D designates 35,000 fewer acres than the Alt C plan as "avoidance areas for the issuance of authorizations" and we are amazed that it designates 12,000 acres fewer than even the "use" alternative (B). This situation needs to be addressed in order to preserve native plant habitat.

O6 (Cont.)

34 **LR-D2.1.2** would appear to authorize the "adjustment" of 9,530 acres of land and target only 87,240 acres for "retention." Keeping native plant habitat in public ownership provides greater protection. We strongly urge that any "adjustment" not include the sale of lands to private interests, but the transfer or trade to other public authority such as the Forest Service or the State of Idaho etc.

Special Designations

35 **SD-D1.1.1** In order to "preserve the existing plant communities" of the Hideaway Islands, the stated intention of this section, Alt D should incorporate a withdrawal from mineral leasing stipulation.

36 **SD-D1.2.2** In order to "protect the unique natural features and ecological diversity" (native plant habitat) which is the stated objective of this section, Alt D should incorporate the stipulation (found in C as well as the "use" alt B) that "all vehicles will be limited to designated routes."

37 **SD-D1.1.6.2** In order to protect native plant habitat at Farnham Forest RNA, Alt D should incorporate stipulation which closes it to motorized vehicles and which withdraws it from mining rights.

38 **SD-C1.7 – Gamlin Lake** – Alt C includes an objective for this area to "preserve the existing wetland and riparian plant communities in a condition that protects ecological diversity and five BLM sensitive plant species through designation as an ACEC". This entire section is missing from Alt D. We have to assume that this was done in error, since the BLM would be remiss in their legal obligations (and would contradict their own policies) to recognize these resources and not provide for some measure of protection for them. ***We urge the planners to carefully look at this and include the Gamlin Lake area as an ACEC in the final draft.*** We believe the Gamlin Lake with its unique peatland habitat, already identified as a host to five sensitive plant species, would be much better suited as an ACEC rather then an SRMA.

39 **SD-C1.7.2** under the section of Alt C, which deals with Gamlin Lake it, states that the BLM will "conduct public outreach concerning the impacts of disturbance and/or weedy species on the riparian/wetland communities." This objective is missing from Alt D; we would urge its inclusion not only for its importance to the Gamlin Lake area, but for its general educational benefit as well.

40 **SD-C1.8** Morton Slough – states an objective to "preserve the existing plant communities in a condition that protects old growth ponderosa pine, bald eagles, and ecological diversity, through designation as an ACEC." This action is missing from Alt D. We urge that it be added to the final plan.

41 **SD-D1.9** Windy Bay states the objective to "preserve the existing remnant grassland community". We fail to see how the BLM will achieve this objective unless it incorporates the stipulation found in Alt C, which would limit motorized vehicles to designated routes. We would further urge the inclusion of Alt C's recommendation to withdraw this area from mineral rights.

General Description of Environmental Consequences

42 **Page 2-138**, *section titled "Vegetation – Invasive Species and Noxious Weeds"* Alt C "establishes vehicle wash requirements to further diminish the potential for the introduction and spread of invasive species and noxious weeds." This item is missing from Alt D and we urge that it be added to the final draft. This simple preventative measure could save the BLM valuable dollars needed to combat the spread of noxious weeds.

Responses

O6-26: BLM is an active member of the Selkirk CWMA and is working with the Bonner County Weed Superintendent to identify all options for milfoil control funding, including the recent State of Idaho funding. BLM also intends to work cooperatively with other landholders and interested parties around Gamlin Lake to identify the presence of Euraisan milfoil, map the extent of any infestations, propose and carry out treatment efforts, and educate lake users on proper methods to reduce weed transport into and\or out of Gamlin Lake.

O6-27: All implementation level projects will undergo the appropriate level of NEPA analysis and documentation.

O6-28: We agree that unmanaged vehicle use is incompatible with multiple use resource management objectives. Consequently, the proposed action would "close" 631 acres to all OHVs and would establish a "limited" travel designation on the remaining 96,139 acres restricting motor vehicles to certain designated routes (Action TM-D1.1.1). Please refer to Maps 37-40. Also see response O5-6.

A complete inventory of resources is not necessary for a programmatic document such as an RMP. Follow-up inventories will be conducted as necessary through project-level planning, and travel routes may be adjusted if it is found that sensitive resources may be affected by their further use.

O6-29: The preferred alternative contains sufficient measures to protect sensitive resources at the same time that it provides suitable levels of access to all user groups. As a compromise alternative, the miles of roads and trails proposed for OHV use fall directly between the "commodity" alternative and the "conservation" alternative, and fits with BLMs mandate to provide for multiple uses.

Note, the proposed action results in a net decrease of motorized access over the existing situation not an increase. A designation change from "open" to "limited" is made on 63,041 acres.

O6-30: Locations of ROW corridors are displayed in Map 45. Some variation of the corridors exact routes will occur based on the items listed in Actions LR-D1.1.1 through 1.1.5. On-the-ground habitat assessments would occur during project-level documentation, and will address all issues required under existing legislation, BLM internal guidance, or agreements with other agencies.

O6-31: Thank you for your comment.

O6-32: Although general locations about the locations of these corridors is provided in Map 45, detailed information about the corridors is beyond the scope of this document. Detailed information of the type assumed to be requested by the commenter would be provided during project-level NEPA documentation.

O6-33: Most of the difference in ROW avoidance area among the alternatives resulted from designation of visual resource management (VRM) Class II areas. Under Alternatives B and C, VRM Class II areas were designated as ROW avoidance areas. Under Alterative C and D, the VRM Class II area greatly increases (42,273 acres under Alternative C and 23,551 acres under Alternative D, compared with 14,312 acres under Alternative B). Preliminary

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Responses
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O6-33 (Cont.): analysis of Alternative B found that it was impractical and ineffective to designate VRM 2 areas as ROW avoidance under Alternative D, given the theme of this alternative. This designation is also not absolutely necessary, since any ROW granted must meet VRM 2 standards when activity occurs within this visual class. The VRM designations under Alternative B are identical to current management, and were designed to maximize opportunities for commodities. Considering this, and the fewer acres of VRM II under this alternative, ROW avoidance in VRM II areas would not be as impractical. Chapter 4 contains more information on effects of visual resources management.

O6-34: BLM has added an action (LR-D2.1.10) to Alternative D which states, Land sales (Sec 203, FLPMA) will not be a mechanism for disposal of Public Lands except for very unique situations specifically; Historical Occupancy Trespass and Hazmat.

O6-35: The existing plant communities would be protected under the no-surface-occupancy stipulation (See NSO-1 Appendix F), that would be a condition of mineral leasing. Potential for locatable minerals is very low. Any salable mineral development authorized by BLM would have to comply with the management objective and actions specified for this RNA/ACEC.

O6-36: On the Alternative D Widow Mountain Motorized Route Designations map (Map 40) motorized travel (to include snow mobiles) in Lund Creek RNA/ACEC is limited to designated routes. Travel management actions under Alternatives B, C, and D specify that motorized travel (except snowmobiles) is limited to designated routes on all BLM lands in the planning area, unless they are designated as closed. Restrictions for snowmobiles are shown on the travel maps.

O6-37: Franham Forest RNA/ACEC is closed to motorized vehicles on the Alternative D Selkirk Motorized Route Designations Map (see Map 39). We have added this restriction to Action SD-D1.6.2 in the Proposed RMP/Final EIS for extra emphasis.

O6-38: The reasons that BLM did not carry designation of Gamlin Lake ACEC forward under Alternative D (the Preferred Alternative) are described in Appendix G. This description identifies other management direction within Alternative D that provides protection for the special values of concern in these areas, to include special status species and riparian/wetland plant communities.

O6-39: This action is already implied as under all alternatives. See Vegetation-Invasive Species and Noxious Weeds (VW), Action VW-1.4.5.

O6-40: The reasons that BLM did not carry all ACEC designations forward from Alternative C to Alternative D (the Preferred Alternative) are described in Appendix G. This description identifies other management direction within Alternative D that provides protection for the special values of concern in these areas.

O6-41: On the Alternative D Coeur d'Alene Motorized Route Designations Map (see Map 38) motorized travel (to include snowmobiles) in Windy Bay RNA/ACEC is limited to designated routes. Also, see response to O6-36.

O6-42: At this time, the BLM land pattern and limited resources make an all-inclusive vehicle wash requirement exceedingly difficult to enforce. The BLM land pattern is such that, on the vast majority of roads that cross BLM, a significant potion of the road also crosses other jurisdictions that have various levels of weed control in place. Requiring vehicle to wash prior to entering BLM land (when the user must often travel along miles of weed infested roadways prior to arriving on BLM land) would be ineffective. BLM proposes to cooperate with adjacent landowners and engage in public education efforts that promote a joint effort to control and prevent weeds through CWMAs.

All alternatives do include weed prevention measures that focus on ground disturbing activities. The BLM currently requires Right-of-way holders to provide for the treatment of noxious weeds and seeding of the roadway to prevent weed introduction and/or spread. Equipment involved in commercial applications may be required to be washed prior to arriving on BLM lands. Additional consideration will be given for weed free and sensitive areas.

Comments

O6 (Cont.)

43 **Page 2-141**, *section titled "Special Status Plants"* – Alt C in which "weed control would be prioritized" needs to be added to alt D which has "more conservation measures for federally listed species than other alternatives."

44 **Page 2-146**, *"Special Designations"* – especially since court case "Norton v Utah" decision has ended the BLM's ability to review and designate Wilderness Study areas, the review and addition of ACEC (Areas of Conservation E Concern) is a vital tool in protecting native plant populations and habitat. The "balance" that Alt D finds in creating ACECs (3 areas totaling 377 acres) versus alt C (19 areas with 23,275 acres) is of grave concern. ***More of the ACEC recommendations made in alt C need to be incorporated into the final plan for meaningful protection for our native plant populations and habitats.***

Affected Environment

45 On page 3 -- 12, the first full paragraph provides a brief mention of insects/disenses, including root rot. It is the only paragraph in the entire 700 plus page RMP which has any information on these vital subjects. And, this brief paragraph merely lists the acreage currently impacted by root diseases and insect infestation with no comparison to the acreage which might historically be expected to be impacted at any given time. Perhaps more importantly there's no indication of how this information has been, or will be, used to guide the development of the RMA.

For a document, which so frequently cites "forest health" as a guiding principle, this sparse amount of information seems woefully inadequate. The lack of any kind of analysis could be interpreted as indicating that insects, disease, and root rot are of no real concern to the BLM in directing management actions. Strong consideration should be given to collecting and including much more information on these subjects in developing proposals to be included in the final DEIS.

46 On **page 3-17** there is a graph that clearly indicates the disappearance of White Pine from the composition of forests in northern Idaho. However, there is no indication in this section or elsewhere of how the BLM will act to return cover types, specifically White Pine, to their historic conditions. We believe that rehabilitation efforts need to go beyond "vegetative treatment" options, which merely amount to the harvesting of timber, in order to restore forest composition to its historic balance. The final plan should include more details involving a greater range of options such as revegetation, reintroduction of natural fire regimes, and forest thinning which is not necessarily depended upon a commercial timber harvest.

47 **Page 3-18** indicates "the ICBMP strategy identifies a management strategy for promoting and sustaining a healthy region wide ecosystem, all supporting economic and social needs, and helping to restore and maintain habitats of plant and animal species." However, the alternative options developed throughout this RMP on do not clearly indicate where, or how, the ICBMP strategy would be implemented. This should be clearly expressed in the final EIS.

48 **Page 3-19** the draft EIS indicates that quote in 1993 the BLM adopted a goal of restoring riparian wetland areas so that 75% or more would be in proper functioning condition (PFC). The draft EIS goes on to state that over 40% of the riparian wetland areas have not even been assessed for their condition. Because riparian wetland areas are critical to many sensitive plant species in our region

O6 (Cont.)

48 we would urge that these evaluations be completed as soon as possible in the BLM make every effort to attain, and a minimum, its stated goals.

49 On page **3-22** the statement is made "the control of one weed species leads to open space that can be quickly colonized by different species of noxious weed." We hope that this statement indicates an understanding that eradication efforts towards noxious weeds needs to be combined with aggressive re-vegetation planting of native plants in order to eliminate the vacuum which weeds quickly fill. We urge that these actions are included in the final RMP.

50 In various places throughout this report justification is made for Alt D not including as many ACEC's as alt C on the basis that adequate protection is already afforded for these areas without such designation. We would draw your attention to the statement made on **page 3-58** regarding the extremely small percentage of land closed to OHV use - "all ACEC/RNAs are closed, largely to protect valued plant habitat." This statement indicates the only way to protect valued plant habitat from OHV use, currently, is to designate it as an ACEC. On this basis we strongly recommend that the final DEIS include many more ACEC's than are in the preferred Alt D.

51 ACEC's - in addition to protecting sensitive plant habitat from OHV use, ACECs also restrict the BLM from granting right-of-way access, which currently occurs 30 to 40 times annually (see page 3 -- 59).

In our area (Bonner County) - we are particularly interested in Gamlin Lake and Morton Slough and urge that they be designated as ACECs in the final RMS.

Incomplete or Unavailable Information

Section, **page 4-11** cites federal regulation 40 CFR 1502.22, which stipulates: "if the information is essential to a recent choice among alternatives, it must be included and addressed in an EIS." Two paragraphs later the text of the RMP states: "certain information was unavailable for use in developing this plan, usually because inventories have either not been conducted or not complete. One of the major types of data unavailable is a current detailed inventory of forest vegetation."

52 These two statements, which appear on the same page, would indicate that prior to the final EIS the BLM would need to complete a detailed inventory of forest vegetation. Without this inventory, or information regarding stand composition, vegetation cover or habitat type, it is impossible for an adequate analysis of the impact that this resource management plan will have on native plants. For these reasons it seems that the BLM would not be able to produce a valid final EIS at this time, nor would we be able to provide our own comments on its impact on native plants. Based on this, we strongly disagree with the final sentence at the end of this page, which states: "no incomplete or unavailable information was deemed essential to a recent choice among the alternatives analyzed in this EIS."

Responses

O6-43: Commenter is mistakenly referring to the summary of environmental consequences, not the alternatives.

O6-44: The reasons that BLM did not carry all ACEC designations forward from Alternative C to Alternative D (the Preferred Alternative) are described in Appendix G. This description identifies other management direction within Alternative D that provides protection for the special values of concern in these areas.

O6-45: BLM is concerned with insect, disease, and root rot infestations. The analysis completed on two extensive inventories that provided the information contained in Table 3-4 shows a 10,400% increase in insect-infected and diseased trees per acre between 1974 and 1992. Also as noted in Chapter 3, Section 3.2.5, Vegetative Communities, 39% of BLM lands had root disease in 2003. To assist with project level planning and implementation, BLM utilizes the USFS annual insect and disease aerial survey flights. Discussions for the Dry Conifer, Wet/Warm Conifer, and Wet/Cold Conifer in Chapter 3, Section 3.2.5, state that insect and/or disease have adversely affected these forest vegetation types to the point that they no longer reflect their historic species composition. If insect and disease problems were not of a concern, they would not have been addressed in the RMP.

O6-46: We agree that the successful reintroduction of WWP involves more than just harvesting trees. Alternative D includes a wide range of silvicultural options (besides timber harvesting) that allow for the reintroduction of WWP (see Action Items VF-D1.2.1, VF-D1.2.3, & VF-D1.2.6). These measures would be implemented during project level planning.

O6-47: BLM planners consulted the ICBMP extensively during the formulation of the alternatives. The DRMP incorporates measures out of the ICBMP that pertain to specific resources within the CDAFO, although these measures may not be identified as such.

O6-48: Actions VR-A1.1, VR-B1.1, VR-C1.1, and VR-D1.1 state that the CDAFO would "Complete riparian and wetland inventory and assessment."

O6-49: Thank you for your comment. Under any alternative, BLM has a vested interest in containing weed outbreaks on their lands and takes a comprehensive approach including education, eradication, cooperation with CWMAs, and revegetation.

O6-50: This statement indicates that plant habitat of especially high value is protected in these ACEC/RNAs by closing them. This does not indicate that this is the only method of protecting such habitat, it is simply the most appropriate method in these cases. BLM has numerous other methods to protect valued plant habitat.

Also note that no areas are designated "open" to motorized vehicle use under the proposed action. The "limited" designations will restrict motorized vehicle uses to designated routes.

The reference to the Rochat Roadless Area as "closed" on page 3-58 of the draft is incorrect and was deleted. (Note: this does not relate to the commenter's statement but was noticed when reviewing page 3-58.

(continued on the following page)

Responses
(Continued from Previous Page)

O6-51: Right-of-way (ROW) restrictions are not automatically implied by ACEC designation. Management restrictions for each proposed ACEC are specified within the alternatives. The area surrounding Gamlin Lake is designated as a ROW avoidance area under Alternatives B, C and D. Morton Slough was proposed for ACEC designation, with ROW avoidance only under Alternative C. The reasons that BLM did not carry this designation forward under Alternative D (the Preferred Alternative) are described in Appendix G.

O6-52: BLM feels that for the preparation of this RMP, the level of detail provided by GAP is sufficient, and that the missing information is not essential to a reasoned choice between alternatives. This is because, as pointed out in 43 CFR 1610.0-5 (k) - "It [a resource management plan] is not a final implementation decision on actions which require further specific plans, process steps, or decisions under specific provisions of law and regulations."

Further such guidance is provided in BLM's Land Use Planning Handbook, which states "Land Use Plans: These broad-scale decisions guide future land management actions and subsequent site-specific implementation decisions." Therefore, actions proposed under this RMP will simply provide a framework for them to be protected at the project level.

Prior to any forest treatment or timber management action, the project area would be delineated and surveyed for sensitive resources. This would occur at the project level and would be subjected to the appropriate level of NEPA documentation.

Alternative A noted that a the FORVIS inventory was in progress on 55,000 acres and Alternatives B, C, and D called for completing a FORVIS inventory on the remaining forest acres.

Comments

O6 (Cont.)

Vegetation -- Forest and Woodlands

53 Under the subsection titled "impacts" there is an indication that the preferred alternative would complete a FORVIS inventory to determine species composition and stocking levels. This is a vital first step in being able to make management decisions regarding treatment areas, methods to be used, and allow for the reintroduction of natural disturbance regimes including fire. It is vital that the final EIS include the completion of this inventory.

54 In several sections in this draft plan is stated that a large amount of the acreage which would be created by Alt C or designated as ACEC's is currently protected in wilderness study areas so that "no additional protection would truly be afforded". We would respectfully point out that the protections that ACEC's provide would help guide management decisions in the event that the WSAs are released.

55 We fully support the efforts that the BLM is undertaking to develop specific wildland fire use plans for approximately 52,000 acres.

Impact from minerals Management

56 On **page 4-99**, in the section regarding **special status species**, the statement is made that: "management impacts on special status plants potentially occur from surface disturbance and thus loss of habitat as well as potential destruction of individual plants." The draft further indicates that under the so-called "commodity" Alt B, 5000 acres would be withdrawn from mineral rights. The " conservation" Alt C would withdraw an additional 24,000 acres. The "compromise" Alt D. would only withdraw 27 additional acres. The compromise in this situation involved a balance 99.9% in favor of the use Alt B. This is not "compromise"; this is capitulation to mining interests. We urge that mineral withdrawals, in the final RMP, are used to protect acreage for sensitive plants based on where their habitat is found, or if inventories are not complete, from areas where their habitat may be found.

Socioeconomics

57 On **page 4-170**, under impact from recreation management, the draft plan predicts that, based on 2004 conditions, $59,000 in revenue would be collected from nearly 148,650 visitors, a stated average of $2.50 per visitor. We would like to point out that 148,650 X $2.50 actually equals $371,625 and so we are perplexed by these math used in these projections. Perhaps more importantly we do not understand why non-motorized users would be projected to spend 1/500th of what OHV users would spend per person. Later on, on the same page, under "impact transportation and travel management" the draft plan indicates that a mere 3.5% of visitor use is for OHV recreation. And yet in this section the economic projections for OHV use are over $10 million, based on an average expenditure per visitor of $1,425. Aside from a few gallons a gas we fail to see how OHV users would spend so much more money than other users and benefit the local economies so much more than everyone else. The fact that this analysis is so lopsided raises questions of validity of the sources and assumptions used to compile them. Additionally, we would point to the fact the OHV users only comprise 3.5% of visitors and yet, so many of the

O6 (Cont.)

57 proposals to open up access for this group has been based, in the RMP, upon the perceived demand for use from this group. How have the needs of the other 96.5% of visitors been accommodated? We ask that the socioeconomic analysis and "user needs" analysis be redone.

58 On **page 4-195**, under the section titled "relationship of short-term uses of the environment for long-term productivity", there's a lack of any meaningful analysis or comparison of these two items. Instead, there is an inconclusive statement that "some long-term productivity impacts might occur regardless of management approach." While this may be true, we would strongly urge the BLM to take the "long-range view" of managing these valuable resources to maintain their current condition and future suitability for use. In order to do this far more information is need for the evaluation required by this section. We ask that information be provided.

List of questions which we would like to see the final plan address:

59 In a BLM publication titled ***"Rare Plants and Natural Plant Communities – a Strategy for the Future"*** opens with this statement: "This strategic plan identifies resource opportunities and actions required to accomplish the national goals and objectives for special status plants and natural plant communities outlined in Fish and Wildlife 2000"

A number of specific goals are outlined in this document:
Develop and implement 325 activity plans for natural plant community management
Construct habitat improvement projects to benefit 176 natural plant communities
Acquire 93,000 acres of lands identified in land use plans as necessary for the conservation of natural plant communities

We would like to know how the Draft RMP addresses these goals and see them used to guide the final DEIS.

60 Federal Land Policy and management Act, according to the FW 2000 document "requires that an inventory of all public lands and their resources and other values be prepared and maintained on a continuing basis." The draft RMP does not offer up these results – has this been completed and how does it guide the planning?

61 This document, on page 25, also states: "The RMP should make appropriate land use decisions that promote the conservation of special status plant species and their habitats. This includes identifying opportunities for habitat acquisition and retention as well as imparting special management designations such as Areas of Critical Environmental Concern, and special plant habitat. A table follows this statement which indicates there are 3 plants in Idaho for which acquisition is needed and a need to acquire 1,210 acres was identified. Are any of these needs located within the area covered by this RMP?

Page 31 identifies the number of research and study programs required for special status plants – in Idaho this table shows 8 completed and 104 needed with specific work and funding objectives – how many of these goals remain in the Panhandle and how does the RMP address that need?

Responses

O6-53: BLM has used the best available data in the development of the draft RMP/EIS. Completion of project level FORVIS inventory for all forest vegetation types and incorporation of this data into the BLM FORVIS database has been ongoing. With current funding levels it is expected that the FORVIS inventory will be completed and entered into the data base before the next planning cycle. This is an objective under Alternatives B, C, and D.

O6-54: This is stated in several sections of Chapter 4: Environmental Consequences. In all but the Vegetation - Forest and Woodlands Section, the statement included "unless released by Congress for multiple use." This oversight has been corrected in the Proposed RMP/Final EIS.

O6-55: Thank you for your comment.

O6-56: Under Alternative C, all ACECs were recommended for withdrawal from mineral entry. Any withdrawal in the RMP is only a recommendation, since only the Secretary of the Interior or Congress can make such withdrawals. Under Alternative D, fewer ACECs were proposed. In addition, when developing this alternative, BLM considered the mineral potential when identifying which areas would be recommended for withdrawal. The Pulaski Tunnel ACEC (27 acres) was the only ACEC which had high mineral potential, and thus was recommended for withdrawal.

O6-57: Miscalculation will be amended in the final plan. The statement of revenue collected from 148,650 visitors reflects the fees that BLM collected from visitors, while the number for OHV users represents the amount that this group injects into the local economy. Additional information from the Socio Economic Report concerning effects of recreation in general to the economy was added. All recreation visitors spend an average of $1,425 (Idaho Department of Commerce, Dean Runyan Associates 1997) and contribute to Idaho's economy.

O6-58: This section has been revised in the Proposed RMP/Final EIS.

O6-59: The publication mentioned in the comment is not a decision-level document, and can only make non-binding recommendations. Therefore, the CDAFO is not required to meet the goals outlined therein. However, actions are specified under all vegetation sections of the RMP, the special status species section, and the lands and realty section that would contribute to the attainment of these goals.

O6-60: Resource inventories in the CDAFO are constantly being updated as resources allow. For the purposes of the creation of a programmatic document such as this, and on-the-ground inventory of all resources is not necessary or appropriate. Comprehensive inventories for physical, biological, and cultural resources will be performed for the area of influence of any implementation-level project that might be proposed during the life of this plan, and for which NEPA documentation must be prepared. Data from many past inventories is described in Chapter 3. The need for inventories have also been identified in a number of objectives and actions in the alternatives (for examples see the Vegetation - Forest and Woodland and Vegetation -Riparian and Wetland sections of the alternatives).

O6-61: Please see response O6-59.

Comments

O6 (Cont.)

61 On page 37, table 8 identifies that there are 12,106,000 acres which need inventory of natural plant communities – have any remaining inventory needs on the Idaho Panhandle been identified and how are they addressed by this plan?

62 Page 41, table 9 addresses a target for the number of botanists for Idaho – have these staffing levels been met?

The BLM publication, *Rare Plants and Natural Plant Communities: A Strategy for the Future*, also states:

"The opportunities for conflict resolution are greatest at the Resource Management Plant (RMP) state. The RMP should make appropriate land use decisions that promote the conservation of special status plant species and their habitats. This includes identifying opportunities for habitat acquisition and retention as well as imparting special management designations, such as Areas of Critical Environmental Concern, on special status plant habitat." And, it further recommends that the BLM "incorporate pertinent recovery plan objectives into RMP's."

Taking our lead from this excellent publication we want to know, and have detailed in the RMP the following:

Inventory (the first step in identifying sensitive plants and plant communities)

63
1. How many of the BLM acres in the CdA district have been inventoried for sensitive plant species?
2. Which acreage has been done?
3. How many have yet to be inventoried?
4. Which acreage specifically awaits inventory?
5. What schedule is anticipated for inventory completion?
6. Specific to acreage, and timetable
7. Include in the RMP the baseline information from the completed inventories:
   a. Number and location of occupied sites
   b. Quality or significance of sites
   c. Number of plants at each site
   d. Types of habitat required
   e. Sensitivity of habitat to the effects of different resource activities and uses
   f. Current and potential threats
8. Describe how special status plant needs and recovery objectives are integrated into each aspect of the CdA BLM's project planning to contribute to potential recovery and delisting.
9. Activity planning: which inventoried sites have site-specific plans developed for all activities (these include habitat management, allotment management and recreation area management plans)?
10. For those inventoried sites lacking site-specific activity planning, what is the schedule (including cost), by site, for development of those?

Monitoring

64 1. Percent of Special Status Plants currently being monitored?

O6 (Cont.)

64
2. Location and description of those populations, with monitoring results.
3. Location and description of unmonitored populations and schedule for initiating monitoring.
4. Personnel available for plant inventory, developing plans for Special Status plants and communities and monitoring?
5. What percentage of those persons' time is available for work towards these goals (subtract funding efforts, fire control, etc.)
6. What are the personnel needs to meet the Special Needs Plant and Community inventory, monitoring and planning goals?
7. How will these personnel needs be met?

In closing, we would again like to thank you for the opportunity to submit comments on this draft RMP/EIS. We sincerely hope that our comments and questions will help to shape a more useful final plan. Should you like clarification on any items mentioned please call on us.

Sincerely,

Philip Hough
President – Kinnikinnick Chapter, Idaho Native Plant Society

Responses

O6-62: Please see response O6-59.

O6-63: Please see response O6-59.

Also, conservation measures for water howellia and Spalding's catchfly are built into the preferred alternative (see Action SS D1.3.1). These measures include conducting surveys, mapping, and database management. Retention or acquisition of habitat for listed plant species is proposed under Action LR-D2.1.1.

In accordance with BLM Manual 6840 (Special Status Species), BLM conducts surveys and monitoring prior to and following implementation of specific actions and projects. For instance, a timber harvest would be preceded by a vegetation inventory, which would include special status plant species. Also, surveying habitat that has high potential for occurrence of Threatened, Endangered, or Sensitive plant species is a priority for the BLM rare plant program, and is not always specifically linked to a proposed ground-disturbing project. This occurs as directed by the BLM Idaho State Office, and is in cooperation with ID Fish and Game Conservation Data Center (CDC), and other agencies.

Currently, CDAFO has inventory and monitoring data on about 10-15% of the lands it administers. This inventory grows with each new project. BLM relied on this data, as well as data acquired from CDC when developing the alternatives and conducting analysis described in this Proposed RMP/Final EIS.

O6-64: Please see response O6-63.

O6-64: Please see response O6-63.

Comments

O7

"Kevin Lewis" <kevin@idahorivers.org>

To <ID_CDA_RMP@blm.gov>

cc

04/14/2006 03:26 PM

Subject Draft Coeur d' Alene Resource Management Plan Comments

United States Department of the Interior April 14, 2006 Bureau of Land Management Coeur d' Alene Field Office
1808 N Third Street
Coeur d' Alene, ID 83814-3407

RE: Draft Coeur d' Alene Resource Management Plan and Environmental Impact Statement
ID-410-2005-EIS-1059

Idaho Rivers United thanks you for the opportunity to provide comments on the Draft Coeur d' Alene Resource Management Plan and Environmental Impact Statement. Idaho Rivers United (IRU) is Idaho's only state-wide river conservation organization. The mission of IRU is "To protect and restore the rivers of Idaho." During the last fifteen-years, IRU's membership has grown to over 3,000 concerned citizens throughout Idaho.

1 IRU supports the Wild & Scenic suitability designations for the Little North Fork Clearwater, Lost Lake Creek, Little Lost Lake Creek and Lund Creek. Further, IRU urges coordination with the United States Forest Service in management decisions related to
2 adjacent designated stream sections. IRU reminds BLM of their responsibility to protect the free-flowing nature, outstandingly remarkable values and recommended classifications until such time as congress makes a final determination on Wild & Scenic designation.

Kevin Lewis
Conservation Director
Idaho Rivers United
P.O. Box 633
Boise, ID 83701
kevin@idahorivers.org

Office (208) 343-7481
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O8

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BUREAU OF LAND MANAGEMENT
COEUR D'ALENE ID 83814

Kootenai Environmental Alliance

P.O. Box 1598 Coeur d'Alene, ID 83816-1598

United States Department of the Interior
Bureau of Land Management
Attn: RMP
Coeur d'Alene Field Office
1808 N Third Street
Coeur d'Alene, ID 83814-3407

April 10, 2006

Dear Mr. Pavey:

The following comments are being submitted for the Draft Coeur d'Alene Resource Management Plan and Environmental Impact Statement (DEIS). It appears NEPA regulations at 40 CFR 1500 thru 1508 apply to the DEIS. The Final EIS should address the following issues.

A. Incomplete or unavailable information:
In our November 9, 2004 letter to Tetra Tech, Inc concerning the Coeur d'Alene RMP, we had a number of concerns relating to old growth, including old growth surveys and blocks of old growth larger than 100 acres. I was unable to locate in
1 Volumes I, II, and III specific old growth information relating to the RMP and old growth issues raised in the November 2004 letter.

The FEIS should include the available old growth data and maps that are associated with each Action Alternative, or describe the old growth information that is either incomplete or unavailable.

B. Impaired watersheds/TMDLs:
Table 3-2 on page 3-7 of the DEIS lists impaired water bodies near BLM lands, the date of the approved TMDLs and schedule for TMDLs under development. Concerning the Lower Clark Fork HUC 17010213 in Table 3-2 it is indicated there is a completed TMDL with the date of completion listed as 2004.
2 Idaho DEQ is preparing a sediment and temperature TMDL for a number of water bodies in the Lower Clark Fork River Subbasin but this TMDL has not been completed.
The FEIS should include a clarification as to the water bodies in the Clark Fork River that have EPA approved TMDLs, and indicate there are water bodies in the Lower Clark Fork River area that require sediment and temperature TMDLs.

3 The FEIS should also include information indicating EPA Region 10 in December 2005 approved the Idaho DEQ 2002 Integrated (303(d)/305(b)) Report.

Responses

O7-1: Thank you for your comment.

O7-2: Thank you for your comment.

O8-1: Planning Issue #2 (Chapter 1, Section 1.4.2), derived from scoping comments, specifically mentions old growth forests. Also, Vegetation treatments in the vicinity of old growth stands would follow direction in the Vegetation - Forests and Woodlands Action VF-B1.2.6, VF-C1.2.6, or VF D1.2.7. Location data on old growth stands is not necessary to determine the affects of these actions.

O8-2: This information has been included in the PRMP/FEIS.

O8-3: This information has been included in the PRMP/FEIS.

Comments

O8 (Cont.)

C. Wild and Scenic Rivers:
On page 3-67 it is stated "The BLM completed a wild and scenic river suitability
4 study as part of the RMP process. On page 3-68, Table 3-32 lists the eligible segments studied for W&S River Suitability. All five eligible segments have been found suitable under Alternative C.

D. OHV use:
The OHV discussions in Volume I include pages 3-57, 3-57, 4-78, and 4-87. In paragraph two on page 4-78 it is stated Alternative C has the least amount of designated roads.
United States Code, Title 42, 1988 edition, includes Executive Order 11643 "Use of Off-Road Vehicles on Public Lands" dated Feb 8, 1972 as amended. The E.O
5 contains 9 sections. Section 8 is titled "Monitoring of Effects and Review, and Section 9 is titled "Special Protection of the Public Lands."
There should be analysis in the FEIS that will indicate whether the selected Alternative would be in full compliance with E.O. 11643.

If this E.O has been replaced or rescinded, there should be information that will indicate the date this E.O. was replaced or rescinded, and there should be information that describes the current Federal Regulations that apply to OHV use on public lands.

E. Alternative C:
6 Alternative C would designate 19 additional Areas of Critical Environmental Concern, and the key components include a number of measures to protect wildlife habitat, water quality, and protection of fish and riparian habitat. This Alternative provides the highest level of protection to lands administered by the Coeur d'Alene Field Office.

We wish to receive a copy of the FEIS when it is released.

Sincerely,

Mike Mihelich Forest Watch Coordinator
These comments are also being submitted on behalf of:
The Lands Council, Mike Petersen, 423 West First Avenue, Suite 240, Spokane, WA 99201, Selkirk Conservation Alliance, Mark Sprengel, P.O. Box 1809, Priest River, ID 83856, and The Ecology Center, Jeff Juel, 314 North First Street West, Missoula, MT 59802

O9

Hans Archer
<HARCHER@ASCMT.CO
M> To
"'id_cda_rmp@blm.gov'"
04/03/2006 06:41 <id_cda_rmp@blm.gov>
AM cc

Subject
cda rmp comments

1 We are happy to see the Middle Fork of Pine Creek open to short wheel base four wheel drives. We would also like to see the Palisade mine road open four this use, but would
2 like to see both of these areas limited to a 100 inch wheel base with a minimum of 12 inches of ground clearance to keep obstacles intact. Vehicles should
3 also be capable of self recovery.
Most trail damage that we encounter is caused by ill-equipped vehicles.
Thanks,
Hans Archer
President of the North Idaho Trail Blazers
Members of the Pacific Northwest Four Wheel Drive Association
and Blue Ribbon Coalition
14414 S. Stangland Rd.
Cheney, WA 99004
(509)299-6084

Responses

O8-4: We are not sure of the point of this comment. The term "eligible" is the correct way to refer to the river segments at this time since suitability is just proposed, not finalized.

O8-5: The commenter probably means to refer to Executive. Order 11644, rather than E.O 11643. In addition to the FLPMA, Executive Order 11644 as amended by E.O. 11989 guides BLM OHV management. Section 8 requires monitoring and periodic adjustment to OHV designations. We are complying with Section 8 by addressing OHV designations in this plan. Section 9 allows for emergency limitations or closures which we do under 43 CFR 8341.2. These are not ORV designations but are interim measures used when travel restrictions have to be made outside of the land use planning designation process. The Executive Order is reproduced in the 2001 National Management Strategy for Motorized Off-highway Vehicle Use on Public Lands. This BLM document is among those that are referenced in the Draft RMP/EIS. Please see references-2.

O8-6: Thank you for your comment.

O9-1: Thank you for your suggestion. See response P42-1.

O9-2: Thank you for your suggestion. There may be a need to define "jeeps" as their own specific unique class of vehicle if we are going to manage routes for "extreme 4WD use". At this time it is more appropriate to deal with the issue at the implementation level rather than the RMP level. Coordination will be required with the Forest Service and the State of Idaho. As you probably know, Idaho Code currently defines only three classes of off-highway vehicles; motorbikes, ATVs and snowmobiles.

O9-3: Thank you for your suggestion. See response O9-2.

Comments

O10

PACIFICORP
A MIDAMERICAN ENERGY HOLDINGS COMPANY

825 NE Multnomah
Portland, Oregon 97232

April 7, 2006

Mr. Scott Pavee
Project Manager Coeur d'Alene RMP
Coeur d'Alene Field Office
1808 North Third Street
Coeur d'Alene, ID 83814

Re: ***PacifiCorp*** Comments on the Draft Environmental Impact Statement for the Coeur d'Alene Resource Management Plan

Dear Mr. Pavee:

1 PacifiCorp appreciates the opportunity to provide comments on the draft Environmental Impact Statement (EIS) for the Coeur d'Alene Resource Management Plan (RMP). Although we do not have any facilities within the Coeur d'Alene planning area, we want to ensure that the Bureau of Land Management (BLM) understands the issues that could potentially impact a Utility that has Rights of Way on federal land that and that these issues are considered when you finalize the EIS and RMP for Coeur d'Alene.

PacifiCorp appreciates the opportunity to submit these comments. We have long recognized the need to develop business practices, both on public and private lands, which are in harmony with valid and appropriate land use requirements. We are confident that our record of stewardship on BLM lands and our comments concerning the Draft EIS will allow BLM to produce a final RMP that offers suitable protections to the variety of issues affecting the lands while accommodating both existing and future electrical facilities used to provide critical electric services to the people of Idaho and throughout the west.

If you have any questions on the comments, please feel free to contact Maggie Hodny in PacifiCorp's Portland office. Maggie can be reached at 503-813-5889.

Sincerely,

Curt Meyers
Manager, Property Management

Enclosure

Cc/encl: Jeff Richards, PacifiCorp
Kirt Rhoads, PacifiCorp

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COEUR D'ALENE ID 83814

O10 (Cont.)

PacifiCorp Comments on the DRAFT Environmental Impact Statement (EIS)
For the Coeur d'Alene Resource Management Plan (RMP)

	Reference	Description of Issue	Suggested Revision/Action
	General		
2	Energy Development	As part of their strategic goals, BLM must help meet energy resource needs. The draft revised RMPs reviewed to date by PacifiCorp appear to under-emphasize the energy development needs of electrical generation and transmission.	As a general matter, PacifiCorp believes that the EIS and RMP should better emphasize and promote issues related to electrical energy development.
3	Sustainable Development	PacifiCorp is aware that many federal land management agencies, including the BLM and the Forest Service, have issued policy statements in regard to sustainable development concepts, which includes provision for renewable energy resources. For example, see the joint federal agency explanation of this concept entitled "*Sustainable Development and its Influence on Mining Operations on Federal Lands*" dated April 2002. In the context of resource planning, this document describes sustainable development as addressing social, economic and environmental interests. This is consistent with PacifiCorp's own vision of sustainability as reflected in our environmental and other policies.	PacifiCorp urges the BLM to use these principles and this terminology when evaluating alternatives.
4	Transmission Corridors	On August 8, 2005, President Bush signed into law the first National Energy Plan in more than a decade. The Plan provides for the designation of "Energy Corridors" in 11 western states, which, in turn, will be incorporated into various RMPs in those states. The enactment of the Energy Corridor requirement emphasizes the importance of proper transmission corridor planning at the western regional and local RMP Plan levels.	PacifiCorp recommends that the BLM take active steps to work with stakeholders at the federal, state, and local level to expand the concept of federal Energy Corridors to state-wide utility corridors that include state and local government lands. In addition to addressing existing energy needs, the establishment of state-wide utility corridors must take into consideration reasonable foreseeable development. Engaging electrical utilities and state land management agencies in the transmission corridor planning process will improve communication and avoid unnecessary delays in the country's efforts to meet current and future demands for electricity.

1

Responses

O10-1: See Chapter 1, Page 1-8, Planning Criteria 1.5.4 "BLM will recognize all valid existing rights."

O10-2: BLM scoping analysis did not find that energy development was a major issue in the planning area. However, the topic is addressed in various sections (e.g. Renewable Energy, Fluid Minerals, and Lands and Realty) of the draft and proposed plans.

O10-3: BLM reviewed and considered "Sustainable Development and its Influence on Mining Operations on Federal Lands" during development of the RMP.

O10-4: BLM is currently conducting a study of this document. When the final document is completed details from that study would be incorporated into, or amend this RMP.

Comments

O10 (Cont.)

	Reference	Description of Issue	Suggested Revision/Action
	Lands and Realty *Volume 1; Chapter 2; Pages 114-118*		
5	Guidelines for ROW Clearance	PacifiCorp has concerns about locating utility ROW adjacent to existing facilities.	PacifiCorp recommends that the EIS and final RMP include guidelines for ROW clearance. For transmission lines we recommend a ROW width of 100 feet; for distribution lines we recommend a ROW width of 50 feet.
6	ROW Incompatibility	PacifiCorp has concerns about the placement of ROW facilities adjacent to each other if any potential issues with safety or incompatibility or resource conflicts have been identified. Activities generally excluded from transmission (high voltage) utility corridors include mining, materials storage and disposal, range and wildlife habitat improvements involving facility construction, non-linear energy project development, blasting, excavation, and high profile (tall) facility development.	The RMP should include a specific provision stating that ROW facilities will not be placed adjacent to each other if issues with safety or incompatibility or resource conflicts are identified. The Western Electric Coordinating Council (WECC), a regional coordinating council for western utility groups, supports this provision. It is not always possible for multiple electrical lines to be located in the same ROW corridor and still maintain adequate separation from other lines or utilities (such as gas pipelines). All utilities must be placed so as to meet reliability and safety standards, particularly with an eye toward reducing the risk of losing all lines due to a common disaster (lighting strike, earthquake, etc.) within a single corridor. WECC recommends that that interconnected transmission systems should be planned to avoid excessive cascading outages with the loss of any two-transmission circuits in a common corridor.
7	ROW Incompatibility	PacifiCorp hes concerns about the potential for conflict and overlap when a new ROW is added to e utility corridor.	To avoid conflicts and overlaps, BLM should adopt procedures that require all existing entities to be notified when thare are plans for an applicant to install a new ROW in a utility corridor to be sure the uses do not conflict with each other.
8	Access Under Emergency Situations	In an electrical emergency situation, a utility must be able to enter onto and conduct repairs or adjustments within e right-of-way area governed by a ROW Grant.	The RMP should include the definition of an Electrical Emergency Condition. As defined in PacifiCorp's ROW grents with the BLM, an "Electrical Emergency Condition" is a condition or situation that is imminently likely to endanger life or property or that is imminently likely to cause a material adverse effect on the security of, or damage to, PacifiCorp's electrical system.

O10 (Cont.)

	Reference	Description of Issue	Suggested Revision/Action
	Off-Highway Vehicle Management *Volume 1; Chapter 2; Pages 110-114*		
9	Access	It is unclear whether a Utilities' use of Off-Highway Vehicles (OHV's) to maintain power transmission and distribution lines is expressly authorized or otherwise officially approved.	Utilities must be allowed access to inspect or repair its structures and facilities without vehicle access restrictions. In most situations this will be accomplished by a 4-wheel drive service truck or an all terrain vehicle (ATV). If repairs are necessary, the use of a high range boom truck may be required. The definition of administrative tasks should be expanded to include power delivery operation and maintenance (O&M) activities and include emergency actions necessary to restore power.
10	Access	Areas proposed for closure to OHV use will prevent utilities from being able to access transmission and distribution lines and poles.	Utilities must have access to its transmission and distribution lines via mechanized vehicles for routine operetion and maintenance, emergency situations (power outages), and for conducting line patrols. Employees need to be able to do emergency work anywhere it is necessary, at any time. Access via over-the-snow vehicles is also necessery in the winter months. Off road vehicular travel for "necessary tasks" should be allowed in all non-WSAs for line maintenance and construction purposes.
	Fish and Wildlife *Volume 1; Chapter 2; Pages 15-22*		
11	Guidelines for Protection of Sensitive Biological Resources	Timing and spatial stipulations for sensitive biological resources should be regarded as guidelines only and not as definitive dates and distances. A one-size fits all approach puts an undo burden on the applicant.	Although PacifiCorp understands the need for developing guidelines to protect sensitive biological receptors, site and project specific information must be taken into consideration. The Agency should present the conditions for controlling surface disturbing and disruptive activities as guidelines, not as mandates.

3

Responses

O10-5: Compatibility of right-of-ways is always a concern. This type of issue would be addressed in a site-specific analysis, but not in this land use plan.

O10-6: Please see response O10-5.

O10-7: By regulation, BLM does notify grant holders in writing when it receives an application for a right-of-way. More detailed information can be found at 43 CFR 2807.14 Rights-of-Way.

O10-8: Compatibility of right-of-ways is always a concern. This type of issue would be addressed in a site-specific analysis, but not in this land use plan.

O10-9: Expressly authorized uses are exempted from OHV restrictions. The specific terms contained in individual right-of-way grants would govern whether there is an exemption or not. In the case of utility rights-of-way, an accompanying road right-of-way (to provide for maintenance access) is generally requested and granted. Some existing right-of-way grants may have to be amended in order to authorize the OHV exemption.

O10-10: Please see response O10-9.

O10-11: The mineral leasing stipulations are consistent with BLM policy. The stipulations include exceptions and waivers to allow for adaptive management.

PUBLIC COMMENTS

Comments

P1

"George Alderson" <george7096@comcast.net>
04/13/2006 10:03 AM

To <ID_CDA_RMP@blm.gov>
cc
Subject Comments on draft RMP

Dear BLM:

Please include this message as our comment on the draft RMP for Coeur d'Alene Field Office. I (George) have visited this area, and I worked with several colleagues who took graduate study at the University of Idaho in Moscow and enjoyed visiting Grandmother Mountain.

1 Our specific concern is that the BLM-managed part of Grandmother Mountain roadless area is suffering degradation because of uncontrolled use by off-road vehicles. Recent visitors have observed that ORVs are going off-trail and imposing impacts on unspoiled terrain.

If this abuse is not halted by measures in the new RMP, you will see further deterioration leading to the loss of important public values. ORVs in the wrong places create excessive surface disturbance that results in erosion, gullying, and siltation of watercourses. ORVs also disturb sensitive species of wildlife and degrade the wildlife habitat values of the land. They also broadcast noise that prevents other visitors from enjoying a quiet day in wild country. We have seen this type of impact in many public land areas of the West. It should not be allowed to ruin the resource values and public enjoyment of Grandmother Mountain.

To resolve this problem, we urge:

2 1. Bar ORVs from five trails: Lookout Mountain/Widow Mountain Trail, Delaney Creek Trail, Lost Lake Trail, Little Lost Lake Trail, and Fish Lake Creek Trail. This will cut down on illegal off-road incursions, stop deterioration of the trails, and keep ORVs from ruining other people's enjoyment.

3 2. Give strict protection to wilderness characteristics of Marks Butte and Pinchot Butte. If BLM is still barred from establishing new wilderness study areas, these should be protected by a comparable management prescription in the final RMP. (Other BLM offices have used this approach to protect sensitive resources in a manner that complies with Secretary Norton's no-wilderness policy.) Eventually these units should be placed in WSA or Wilderness Inventory Area status. ORVs should be barred from these areas, as they are roadless and they support unique ecosystems that would be damaged by ORV impacts.

Please keep us informed of further action on the Coeur d'Alene RMP. Thank you for considering our views.

Sincerely,
George & Frances Alderson
112 Hilton Avenue
Baltimore, MD 21228
E-mail: george7096@comcast.net
Tel: 410-788-7096

P2

"Paul Allan" <pallan99@hotmail.com>
04/13/2006 08:50 AM

To ID_CDA_RMP@blm.gov
cc
Subject Roadless Areas Comment

Dear BLM:

I am writing to provide comment on your development of a revised Resource Management Plan for North Idaho. I have personal experience with the abuses that have occured in some of the designated Roadless Areas and Wilderness Study Areas.

Grandmother Mountain trails, including Lookout Mt./Widow Mt., Delaney Creek, Lost Lake, Little Lost Lake, and Fish Creek trails, are used by residents from local urban centers to relax and get a wilderness experience. They are the closest roadless areas to Moscow and surrounding towns. Motorized use of these areas causes not only major conflicts, but destruction of the trail systems. On an early spring hike last year, my wife and I encountered numerous dirt bike riders freely roaming the trails of Grandmother Mountain. Snow was still on many parts of the trails and the spring foliage was just beginning to come through the moist soil.
When we pointed out the trails were not for motorized vehicles, the riders rudely informed us that no one ever said anything to them, it wasn't marked as no motorized vehicles from the way they entered the trail system, and all "Forest Service" land was open for multiple use. Since some of the bikers were armed (hunting in the spring?) we did not pursue the issue further.

1 With Clarkia dirt bike raceway just a short istance from this wilderness area, the bikers feel they can come acorss the road and ride freely in all the backcountry. Protection for this area, the trails and the ecosystems, needs to continue, be strenghtened, and be enforced.

2 I would add that Mark's Butte and Pinchot Butte areas also deserve to be designated as Wilderness Study areas. They have unique ecosystems and should be protected from intrusion by motorized vehicles.

3 Please take these comments into consideration when developing your plan. Stronger rules for roadless areas in North Idaho need to be enforced and advertised. Please help keep our wilderness a place for solace, rather than conflict.

Paul Allan

****
Paul J. Allan
524 Spotswood St.
Moscow, ID 83843
208-883-9502
pallan99@hotmail.com

Responses

P1-1: As indicated on page 1-7, roadless area inventories and wilderness suitability determinations are beyond the scope of the RMP. BLM's recommendations on Wilderness Study Areas were forwarded to the President in 1991. Those recommendations were later forwarded to Congress, and continue to await Congressional action. We have been directed by BLM Instruction Memorandum No. 2003-275 that "the BLM's authority to conduct wilderness reviews, including the establishment of new WSAs, expired no later than October 21, 1993, with the submission of the wilderness suitability recommendations to Congress pursuant to Section 603 of the FLPMA" and also, "that the BLM is without authority to establish new WSAs." The three BLM wilderness study areas within the planning area were recommended non-suitable for wilderness designation. Elimination of allowed motorized uses to manage these non-suitable WSAs as if they were wilderness is inconsistent with and contrary to the recommendations before Congress. Consequently, alternatives to make "closed" vehicle designations were considered but not carried forward. The document was modified to make this clear.

The BLM does have the responsibility to manage WSAs in accordance with BLM Handbook H-8550-1, Interim Management Policy for Lands Under Wilderness Review (IMP) until such time as Congress acts to designate them as wilderness or release them from further consideration. The basic interim management standard is termed the "non-impairment" standard and says WSAs shall be managed "in a manner so as not to impair the suitability of such areas for preservation as wilderness" (p. 2). "Management to the non-impairment standard does not mean that the lands will be managed as though they had already been designated as wilderness" (p. 5). The IMP says with regard to motor vehicle use, "Mechanical transport, including all motorized devices as well as trail and mountain bikes may only be allowed on existing ways" (p. 16). Also, "Some lands under wilderness review may contain minor facilities that were found in the wilderness inventory process to be substantially unnoticeable. For example, these may include primitive vehicle routes ("ways") and livestock developments. There is nothing in this IMP that requires such facilities to be removed or discontinued. On the contrary, they may be used and maintained as before, as long as this does not cause new impacts that would impair the area's wilderness suitability" (p. 12).

You are correct that if uncontrolled, motor vehicle use will cause surface disturbances. If unchecked, wilderness suitability could eventually be impaired. Vehicle use in the Grandmother Mountain WSA is limited to the boundary roads and is limited to 2-wheeled vehicles on designated trails where trails are single-track. The proposed action is to continue this "limited" designation. ATV use of single-track trails is currently prohibited and this prohibition would continue. The real issue is management and enforcement, which should be improved. To this end, the proposed action would establish the Widow Mountain Special Recreation Management Area and include all BLM lands in and around the Grandmother Mountain WSA (see Action RC-D1.1.1). Currently this is an extensive management area and receives only custodial recreation management.

(continued on the following page)

Responses
(Continued from Previous Page)

P1-1 (Cont.): An additional action would expand the Lund Creek Research Natural Area to include Pinchot Marsh (Map 55). Also see Action RC-D1.8.1, specifying maintenance of the existing semi-primitive setting. In addition, note Actions RC-D1.8.3 and TM-D1.1.9 stressing coordination of travel restrictions with the Forest Service. This is important to solving current problems that exist because the Forest Service travel restrictions in the area are less stringent and do not match the BLM's.

P1-2: Thank you for your suggestion. Please see response to P1-1.

P1-3: Thank you for your suggestion. Please see responses to P1-1 and O5-16.

P2-1: Thank you for your suggestion. Please see response to P1-1. Your comments mentioned OHV damage specifically on Grandmother Mountain. Please be aware that the western portion of the Grandmother Mountain Wilderness Study Area, which includes Grandmother and Grandfather Mountains, was transferred by Congress to the U.S. Forest Service by the Arkansas-Idaho Land Exchange Act of 1992. BLM no longer has management authority over this part of the WSA and our travel restrictions do not apply to the transferred western portion.

P2-2: Thank you for your suggestion. Please see response to P1-1.

P2-3: Thank you for you suggestion. Please see responses to O4-1 and O5-16.

Comments

P3

"Dick Artley" <DArtley@connectwireless.us>

03/29/2006 05:07 PM

To <ID_CDA_RMP@blm.gov>

cc

Subject Public comments on the Coeur d'Alene Field Office management plan

March 29, 2006

To: BLM Planners

I am a retired Forest Service forest planner. A major part of my job was to: 1) teach the NEPA, 2) do legal reviews on all NEPA documents written on the Nez Perce National Forest, 3) write NEPA documents, and 4) advise people on the NEPA when they had questions. I held this staff-level job for 16 years. I know what a good NEPA document should look like and how it should be formatted for the public to understand.

While browsing the WEB I saw the URL for the DEIS for the management plan. I read it several times and I will tell you this: it's the worst excuse for a DEIS I have ever read. It should be studied in public land management education courses as what not to do. It really is that bad. What grade school did you contract with to have them write it?

Not only was the NEPA terrrible, but the land management issues you address look like they considered by a child.

I only retired several years ago, but I'm still aware of the largest threats to public land now and in the future, (see below)

1

Major Threat: Road construction (system or temporary ... it makes no difference),
Threat #2: Resource extraction (logging, mining and grazing),
Threat #3: Agencies lying to the public with sweet sounding euphemisms,
Threat #4: Uncontrolled ATV traffic (including snowmobiles),
Threat #5: Noxious weeds (although this threat is not so great as to justify the use of poison (a.k.a. herbicides) on MY public land.

Sincerely,

Richard Artley

Richard Artley
415 East North 2nd
Grangeville, Idaho 83530

P4

"Dick Artley" <DArtley@connectwireless.us>

04/12/2006 09:27 PM

To <ID_CDA_RMP@blm.gov>

cc

Subject North Idaho BLM Plan revision Comments

April 12, 2006

Dear BLM Planner,

I am the recently retired forest planner from the Nez Perce National Forest in Grangeville Idaho. I was the coordinator and writer/editor for the first Nez Perce forest plan finalized in 1985. Until I retired in 2003, I did nothing but planning, writing forest plan amendments, and was assigned to do legal compliance checks of all NEPA documents produced on the forest. I know planning and I know public land issues very well.

A friend of mine from Moscow Idaho recently informed me that the BLM is revising their Resource Management Plan for all public land acres managed by the BLM in northern Idaho. She was quite concerned that the Grandmother Mountain Roadless Area will continue to be adversely affected ... and this revised plan will do nothing to stop it. She simply does not trust the BLM to manage the area right for all 298 million American owners.

1

Her primary concern was that the BLM has never attempted to keep motorized ORVs and ATVs from running on trails intended for foot and horse traffic. I told her that the Forest Service was faced with the same problem. I also told her that a new or revised plan was not needed to control this destructive traffic.

On the Nez Perce Forest, we adopted a policy that any and all trails were closed to motorized vehicles, unless specifically signed as open. We publicized this widely. We then took a large part of our law enforcement funding and dedicated it to enforcing this new policy. We made out many costly tickets and made a few ATV hooligans quite angry. The great thing about these tactics was that they worked. Word got out that riding ORVs or ATVs on anything but a road, would cost the rider dearly on the Nez Perce.

We felt that this was more very necessary. Before the new policy, the Nez Perce Forest had scores of complaints about:

1) horses that were scared by the ATV noise and throwing the rider ... one time sustaining serious injuries.
2) hikers that had to run off the trail to keep from being hit by ATVs driving at a high rate of speed. In many cases, the riders were described as laughing.
3) hikers and campers who entered the woods for peace and quiet, however their experience

Responses

P3-1: The planning issues were derived from analysis of the management situation and comments received during public scoping as described on page 1-3. More detailed information on scoping and the planning issues is available on the RMP website at www.blm.gov/rmp/id/cda.

P4-1: Thank you for your comment.

Comments

P4 (Cont.)

was ruined by the scream of 2-cycle engines miles away.

We felt that uncontrolled ATV/ORV traffic on foot trails created a potential legal liability problem. We had no choice but to crack down and crack down hard!

The Grandmother Mountain Roadless Area is used by many residents and college students from Pullman and Moscow. Not only is it an inventoried roadless area, but it is a Wilderness Study area. Nearly all of these people use the roadless area in non-motorized ways. Why on earth would you let 5% of the users spoil the experience for the other 95%.

2 The Wilderness Act of 1964 states that once an area becomes a wilderness study area, under no circumstances will any activity be allowed to reduce the wilderness character of the area. Since you still allow ORVs in this area to run willy-nilly wherever their vehicle will go, the BLM is in violation of the Wilderness Act.

I was stunned to find out that ALL foot trails inside the roadless area are still open to ORV use. Please let me respectfully say that this is either laziness or lack of knowledge on the part of the BLM. This use has become abuse as many motorized users have chosen not to ride on the trail system.

2 In your revised North Idaho Plan you MUST prohibit ATVs and ORVs from operating in the ENTIRE Grandmother Mountain Roadless Area. This is a roadless area people!!!!! Do you not understand the written English language. This is a roadless area and ORVs/ATVs create road-like 50" to 80" wide tracks through the forest.

Sincerely,

Richard Artley

Richard Artley
415 East North 2nd
Grangeville, Idaho 83530

P5

"Louise Ashmun" <lashmun@hotmail.com>
04/13/2006 01:02 PM

To: ID_CDA_RMP@blm.gov
cc:
Subject: Public comment on Roadless Area

As an employee of the USDA-Forest Service, I am well aware of how difficult it is to manage public lands for the mutual benefit of the people as well as future generations. I do not normally wade into the public fray over management decisions; however, some unpleasant personal experiences on the Grandmother Mtn. Trail System have motivated me to respond.

My husband and I live in Moscow, ID and pursue non-motorized outdoor recreation as often as possible. Last spring, we chose to hike up at Grandmother Mtn. because it is the only roadless area within easy access of our home. We were trudging through snow, amazed at its depth and tenacity, when we heard the roar. Six dirt bikes came over the rise and skittered downhill through the snow with little to no control over their progress. We quickly jumped off the trail and pulled our dog with us--it was a close encounter that we hadn't planned on! The folks on the bikes were friendly and non-threatening, but I was angry that they were there. This small trail system is precious little of the national public land system of the area. Most the country side is open to motorized vehicles and those of us who to prefer to walk, ski, or snowshoe are rarely able to leave the smelly, noisy OHVs (snow machines, ATV's, dirt bikes, etc.) behind (not to mention the threat of being in the line of fire during the various open hunting seasons!). It seemed wrong that
1 these OHVs are allowed in the roadless areas as it violates the intention of the rule if not the letter of the rule.

I agree with the following points as made by the Friends of the Clearwater:
1) Due to the high use of this region by primitive recreation enthusiasts, motorized use causes a major conflict

2) As this is an inventoried roadless area and in part a Wilderness Study Area its
2 ecological integrity may be compromised by increasing motorized abuse

3) Mark's Butte and Pinchot Butte, home to unique ecosystems and without road systems, should be designated as Wilderness Study areas

I am strongly advocating the Grandmother Mountain trails (Lookout Mt./Widow Mt. Trail, Delaney Creek Trail, Lost Lake Trail, Little Lost Lake Trail, Fish Lake Creek Trail) be closed to ORV use.

Sincerely,

Louise Ashmun
Louise E. Ashmun
524 Spotswood Street-- Moscow, ID 83843 -- (208) 883-9502 lashmun@hotmail.com

Responses

P4-2: Thank you for your suggestion. Please see response to P1-1.

P5-1: Thank you for your comment.

P5-2: Thank you for your suggestion. Please see response to P1-1. Your comment letter mentioned OHV damage specifically on Grandmother Mountain. Please be aware that the western portion of the Grandmother Mountain Wilderness Study Area, which includes Grandmother and Grandfather Mountains, was transferred by Congress to the U.S. Forest Service by the Arkansas-Idaho Land Exchange Act of 1992. BLM no longer has management authority over this transferred western portion of the WSA and our travel restrictions do not apply to it.

Comments

Responses

P6

US DEPARTMENT OF THE INTERIOR, BUREAU OF LAND MANAGEMENT
DRAFT RESOURCE MANAGEMENT PLAN (RMP) AND ENVIRONMENTAL IMPACT STATEMENT (EIS) FOR THE
COEUR d'ALENE FIELD OFFICE, NORTHERN IDAHO

Public Comment Card

Please use this comment card to submit input regarding the project alternatives and potential environmental impacts of the RMP as identified in the EIS. Please include any sources of relevant data or information that you feel may enhance this document. Written comments must be received by April 14, 2006.

Comments can be submitted in the following ways:

1. Turn in today at the Public Meeting; or
2. By US Mail addressed to BLM Coeur d'Alene Field Office, ATTN: RMP, 1808 N. Third Street, Coeur d'Alene, ID 83814 ; or
3. By E-mail to ID_CDA_RMP@blm.gov; or
4. By Fax to (208) 769-5050.

Privacy Notice: All public comments, including names and mailing addresses of respondents, will be available for public review at the Coeur d'Alene Field Office and may be published as part of the EIS. *If you wish to withhold your name or street address from public review or from disclosure under the Freedom of Information Act, please state this prominently at the beginning of your written correspondence.* The BLM will honor such requests to the extent allowed by law. All submissions from organizations and businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be available for public inspection in their entirety.

Please Print Legibly

Name: Chad Deacon Ford

Affiliation (if any):

Street Address: PO Box 501

City, State, Zip: Cocolalla, ID 83813 Date: 4/08/06

Comments: (Comments may be continued on the back or a separate sheet.)

1 Keep the 4x4 trails open!! This opportunity is a family event. We took our 9 month old son & two dogs four-wheeling with the North Idaho Trailblazers. What a great experience for all of my family. Do not close any trails, please!!

RECEIVED
APR 11 2006
BUREAU OF LAND MANAGEMENT
COEUR D'ALENE ID 83814

Comments must be received by April 14, 2006

P6-1: Thank you for your comment.

P7

RECEIVED
APR 06 2006
BUREAU OF LAND MANAGEMENT
COEUR D'ALENE ID 83814

US DEPARTMENT OF THE INTERIOR, BUREAU OF LAND MANAGEMENT
DRAFT RESOURCE MANAGEMENT PLAN (RMP) AND ENVIRONMENTAL IMPACT STATEMENT (EIS) FOR THE
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Please Print Legibly

Name: JOEL BARKER

Affiliation (if any): NORTH IDAHO TRAIL BLAZERS

Street Address: 16270 N. Westwood Dr

City, State, Zip: Rathdrum Idaho 83858 Date: 3/28/06

Comments: (Comments may be continued on the back or a separate sheet.)

1 Being AN OUTDOOR enthusiast who normally utilizes forest routes weekly I have found 4 wheel drive areas universal closed to Jeep width vehicles with the exception of the Pine Creek drainage.

2 I would like to see this area kept open to travel for Jeep width vehicles. I would also like access open in other areas other than Pinehurst Pine Creek area if possible.

Comments must be received by April 14, 2006

P7-1: Thank you for your comment.

P7-2: Thank you for your suggestion. Please see response P42-1.

Comments

P8

jo earth
<showerdishes@yahoo.com>

04/14/2006 01:50 AM

To: ID_CDA_RMP@blm.gov
cc:
Subject: grandmother's butte, pinchot butte, and mark's butte roadless areas

Due to the high use of this region by primitive recreation enthusiasts, motorized use causes a major conflict. As this is an inventoried roadless area and in part a Wilderness Study Area its ecological integrity may be compromised by increasing motorized abuse.Mark's Butte and Pinchot Butte, home to unique ecosystems and without road systems, should be designated as Wilderness Study areas

1

Grandmother Mountain trails that should be closed to ORV use

Lookout Mt./Widow Mt. Trail
Delaney Creek Trail
Lost Lake Trail
Little Lost Lake Trail
Fish Lake Creek Trail

Please consider all this as life on earth sort of really seems to depend on all these non-human areas. Thank-you, Joseph Bayley

P9

RECEIVED
APR 1 4 2006
BUREAU OF LAND MANAGEMENT
COEUR D'ALENE ID 83814

US DEPARTMENT OF THE INTERIOR, BUREAU OF LAND MANAGEMENT
DRAFT RESOURCE MANAGEMENT PLAN (RMP) AND ENVIRONMENTAL IMPACT STATEMENT (EIS) FOR THE COEUR d'ALENE FIELD OFFICE, NORTHERN IDAHO

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3. By E-mail to ID_CDA_RMP@blm.gov; or
4. By Fax to (208) 769-5050.

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Please Print Legibly

Name: Lucas D. Bell

Affiliation (if any): _____

Street Address: PO Box 663 4800 Grove St.

City, State, Zip: Athol ID 83801 Date: 4-8-06

Comments: (Comments may be continued on the back or a separate sheet.)

1 N. ID needs more designated trails for jeeps or ATV. It would help keep up the forest because people would be more apt to STAY out of the offroad Areas & STAY on the designated trails.

Comments must be received by April 14, 2006

Responses

P8-1: Thank you for your suggestion. Please see response to P1-1.

P9-1: Thank you for your comment.

Comments

P10

"Fred Brackebusch" <minesystems@usamedia.tv>

To <ID_CDA_RMP@blm.gov>

cc

05/01/2006 03:50 PM

Subject Comments

Comments from:

Fred W. Brackebusch, President
New Jersey Mining Company
P.O. Box 1019
Kellogg, ID 83837

208 783-3331

1 On Map 15 an area near Wallace Id is shown to be closed to mining under Alt C and D. This area is probably held already with unpatented claims. How can an area be withdrawn from entry when it is already staked?

2 The large area NE of St Maries that is closed to mining probably has low mineral potential, but I did not read about a good reason for withdrawing it.

3 I am skeptical about the need to close as many roads as are being closed and am concerned about the effects of limited access not only for recreational purposes, and the economic effects thereof, but also for fire and emergency purposes.

Responses

P10-1: Lands can be withdrawn form the mining laws at any time but they remain subject to valid existing rights.

P10-2: This is a WSA (Crystal Lake) which is closed to leasing and in most cases closed to sale, but locatable mineral activities can occur if they do not impair the wilderness suitability (H-8550-1, Interim Management Policy for Lands Under Wilderness Review).

P10-3: Thank you for your comment.

P11

"Rob Briggs" <rsb@turbonet.com>

To <ID_CDA_RMP@blm.gov>

cc

04/13/2006 11:29 PM

Subject Grandmother Mountain trails

1 Please close all Grandmother Mountain trails to ORV use. This area is of special value to residents of the Moscow-Pullman area seeking peace and quiet and the enjoyment of a natural setting that is largely undisturbed.
While many hikers, cross-country skiers, and other non-motorized recreationists can enjoy this area simultaneously without compromising its integrity, it only takes one noisy ORV to spoil the solitude of a multi-square-mile area and to leave the environment scarred and diminished.

1 ORV use is entirely incompatible with an area that contains a wilderness study area and unique ecosystems on Mark's and Pinchot Buttes that also deserve wilderness designation. Please be good stewards of these public resources and close them to further ORV abuse.

Sincerely,

Robert S. Briggs
837 SE Edge Knoll Drive
Pullman, WA 99163 USA
Voice: 509-332-5819
eMail: rsb@turbonet.com

P11-1: Thank you for your suggestion. Please see response to P1-1.

Comments

P12

US DEPARTMENT OF THE INTERIOR, BUREAU OF LAND MANAGEMENT
DRAFT RESOURCE MANAGEMENT PLAN (RMP) AND ENVIRONMENTAL IMPACT STATEMENT (EIS) FOR THE COEUR d'ALENE FIELD OFFICE, NORTHERN IDAHO

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COEUR D'ALENE ID 83814

Public Comment Card

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2. By US Mail addressed to BLM Coeur d'Alene Field Office, ATTN: RMP, 1808 N. Third Street, Coeur d'Alene, ID 83814 ; or
3. By E-mail to ID_CDA_RMP@blm.gov; or
4. By Fax to (208) 769-5050.

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Please Print Legibly

Name: Cedar Brinkley

Affiliation (if any): North Idaho Trailblazers

Street Address: 18219 W Hauserview dr

City, State, Zip: Hauser Lake Idaho 83854 Date: 4-8-06

Comments: (Comments may be continued on the back or a separate sheet.)

I've always enjoyed driving my 75 bronco on all the Trails located on the blm land Pine creek, West pine creek, Kaloosa creek, Highland creek, To see the old mines around the County, and all the extream opstical s that are located on blms land

1

Comments must be received by April 14, 2006

P13

grundy <grundy@turbonet.com>
04/14/2006 08:28 AM

To: ID_CDA_RMP@blm.gov
cc:
Subject: Grandfather Mountain Trails

Good morning,

1 I understand that you are considering trail usage in the Grandfather Mt area. I am more or less against letting ATVs and other motorized vehicles destroy our wilderness. Specifically the following trails should be off limits to motorized vehicles.

Lookout Mt/Widow Mt.
Fish Lake
Lost Lake
Little Lost Lake

Thank you,

Bill Caldwell
1091 Saddle Ridge Road
Moscow Idaho 83843

Responses

P12-1: Thank you for your comment.

P13-1: Thank you for your comment. Please see response to P1-1.

Comments

P14

US DEPARTMENT OF THE INTERIOR, BUREAU OF LAND MANAGEMENT
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Please Print Legibly

Name: BRAD RAFFIN / SARAH CAMPBELL
Affiliation (if any):
Street Address: 1037 TEFFT ST
City, State, Zip: CORVALLIS MT 59828 Date: 4/8/06

Comments: (Comments may be continued on the back or a separate sheet.)

1 We had A real enjoyable time
All the trails should remain open

Comments must be received by April 14, 2006

P14-1: Thank you for your comment.

P15

US DEPARTMENT OF THE INTERIOR, BUREAU OF LAND MANAGEMENT
DRAFT RESOURCE MANAGEMENT PLAN (RMP) AND ENVIRONMENTAL IMPACT STATEMENT (EIS) FOR THE COEUR d'ALENE FIELD OFFICE, NORTHERN IDAHO

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Please Print Legibly

Name: Jody Degenstein
Affiliation (if any):
Street Address: 308 E. Wabash
City, State, Zip: Spokane, WA 99207 Date: 4/8/06

Comments: (Comments may be continued on the back or a separate sheet.)

1 The runs were great. Please don't
Shut them down -
Maybe more trails can be
opened

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COEUR D'ALENE ID 83814

Comments must be received by April 14, 2006

P15-1: Thank you for your comment.

Comments

P16

Wildspirit999@aol
.com

04/13/2006 10:07
AM

To: 1D_CDA_RMP@blm.gov
cc: Wildspirit999@aol.com
Subject: RMP Public Comment

April 13, 2006

Resource Management Plan
Coeur d' Alene Field Office
1808 N. Third Street
Coeur d' Alene, ID 83814

This is comment to submit input regarding the project alternatives and potential environmental impacts of the US Department of the Interior, Bureau of Land Management (BLM) Resource Management Plan (RMP) as identified in the Environmental Impact Statement (EIS) for the Coeur d'
Alene Field Office, Northern Idaho.

Comments:

I am a citizen taxpayer and member of the general public.

I wish to provide input for the millions of us citizen taxpayers and members of the general public whom have trail 4x4 motorized vehicles, but do not know of this RMP. It was only by accident that I was informed of this RMP in process. I only wish I could give you names and addresses for all the people that would like to comment in a manner similar to me if they were aware of this and given a real comment opportunity.

I, and millions of us whom have trail 4x4 motorized vehicles, endorse trails and the responsible use of public lands for people. I believe I have some familiarity with some of the trails that are currently being discussed. However, I place my comment concerning any trail and for all trails that could be, but aren't or trails that no longer are.

I am only familiar with seven trails in the area that I understand are being considered.

Palisides Mine Road
Twin Craig's
Latour Creek
Westfork Pine Creek
1 Middlefork Pine Creek
Highland Creek
Pine Point

Millions of us whom have trail 4x4 motorized vehicles endorse trails and support the responsible use of public lands for people, my comments are:

There are millions of us whom have trail 4x4 motorized vehicles and we endorse motorized trails and the responsible use of public lands for people. We endorse the continuing use of the above trails for responsible motorized use.

P16 (Cont.)

We, and millions of us whom have trail 4x4 motorized vehicles, endorse trails and the responsible use of public lands for people, think it is irresponsible for government, by the people, of the people and for the people and that are charged with proper management of public lands and being supported by taxpayer money to manage those lands irresponsibly.

There are millions of us whom have trail 4x4 motorized vehicles and we endorse motorized trails and the responsible use of public lands for people and there are more people joining our ranks daily.

The population of our country is growing daily. There are thousands of miles of new roadways being built annually. These roads are for all citizens to use motorized vehicles
2 on. Too much use of these roadways results in the degradation of such roadways and usually results in additional roadways to meet the additional demand of more use. Governmental roadway managers are charged with providing additional roadways; to do otherwise is poor roadway management (negligence/misfeasance) at best and gross negligence (malfeasance) at worst.

There are millions of us whom have trail 4x4 motorized vehicles and we endorse motorized trails and the responsible use of public lands for people and there are more people joining our ranks daily. Maintaining the same number of motorized trails means more and more use of the trails as a natural consequence of more and more 4x4 motorized vehicles.

Additional motorized trails and new motorized trails are required to maintain a balance of the trails and prevent degradation. There are millions of us whom have trail 4x4 motorized vehicles and we endorse motorized trails and the responsible use of public lands for people and there are more people joining our ranks daily. Are area land managers that do not promote motorized trail growth negligent and committing misfeasance by definition?

Elimination of motorized trail miles or elimination of motorized trails with more and more
3 users means more and more use of those trails. There are millions of us whom have trail 4x4 motorized vehicles and we endorse motorized trails and the responsible use of public lands for people and there are more people joining our ranks daily. Motorized trail loss is critical and can cause degradation to existing trails. Are area land managers that allow loss of motorized trails and do not promote additional trails and do not promote motorized trail growth grossly negligent and committing malfeasance by definition?

The population of our country is growing daily. There are thousands of miles of new roadway being built annually. These roads are for all citizens to use motorized vehicles on. There are millions of us whom have trail 4x4 motorized vehicles and we endorse motorized trails and the responsible use of public lands for people and there are more people joining our ranks daily. Motorized trail loss is critical and can cause degradation to existing trails. Additionally, aside from negligence, misfeasance, and malfeasance, is the failure for land managers to provide additional motorized trail mileage and trails adequate to prevent degradation of motorized trails illegal?

The Equal Protection Clause of the 14th Amendment of the United States Constitution provides, "No state shall ... deny to any person within its jurisdiction the equal protection of the laws." This clause requires land users who are similarly situated to be similarly treated (except where treating them differently can be justified).

There are millions of us whom have trail 4x4 motorized vehicles and we endorse motorized trails and the responsible use of public lands for people and there are more people
4 joining our ranks daily. Under the Constitution of the United States and the individual States, are the millions of us whom have trail 4x4 motorized vehicles and endorse motorized trails and the responsible use of public lands for people of which there are more people joining our ranks daily entitled to Equal Protection?

I am only familiar with the seven trails in the area listed below that I understand are currently being considered in the RMP. However, by my knowledge, the millions of us whom have trail 4x4 motorized vehicles that endorse motorized trails and the responsible use of public lands for people and the more people joining our ranks daily should be considered to similarly comment.

Responses

P16-1: Thank you for your suggestion. The proposed action would establish a "limited" travel designation on most BLM land (Action TM-D1.1.1). To implement this RMP allocation, motor vehicle use would be restricted to certain designated routes. Use of some routes would be further restricted by season of use or class of vehicle. Implementation decisions to establish a network of designated vehicle routes were also made in the RMP. Please refer to Maps 37-40. In the Pine Creek area the Middle Fork Pine Creek route is open and managed for 4WD activities (See Recreation Management Action RC-D1.5.7). Additional roads in the area are also designated as travel routes. The Palisades Mine route remains closed because the BLM continues to have safety concerns with it. The Calusa Creek Road remains closed because the lower end is washed out and use in its current condition is a water quality/sedimentation concern. In accordance with Recreation Management Action RC-D1.5.6 the BLM will work towards designing an interconnected recreation road and trail network in the area. Adjustments to the designated transportation network can be made over time in accordance with Action TM-D1.1.8 as conditions change and easements are acquired.

P16-2: Thank you for your comment.

P16-3: Thank you for your comment.

P16-4: Everyone is entitled to equal protection under the proposed RMP.

Comments

P16 (Cont.)

Palisides Mine Road
Twin Craig's
Latour Creek
Westfork Pine Creek
Middlefork Pine Creek
Highland Creek
Pine Point

This is comment to submit input regarding the project alternatives and potential environmental impacts of the Resource Management Plan (RMP) as identified in the Environmental Impact Statement (EIS) for the Coeur d'
Alene Field Office, Northern Idaho.

5 We, the people, demand that the above listed trails and all others that may lay within the province and within the jurisdiction of the US Department of the Interior, Bureau of Land Management (BLM), be properly considered under good land management for suitability for continuing and expanded use as motorized trails.

6 Further, petition is hereby made for additional motorized trails and trail miles of like quality and similar difficulty as well as increased difficulty to provide an adequate trail system to meet the trail use needs of the millions of us whom have trail 4x4 motorized vehicles that endorse motorized trails and the responsible use of public lands for people and for the people joining our ranks daily.

Thank you for your efforts in behalf of good land management and increase of motorized trail access to our public lands.

Forrest Dexter &
in behalf of the millions &
for the future
P.O. Box 810
Veradale, WA 99037

Responses

P16-5: Thank you for your comment.

P16-6: Thank you for your comment.

P17

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COEUR D'ALENE ID 83814

US DEPARTMENT OF THE INTERIOR, BUREAU OF LAND MANAGEMENT
DRAFT RESOURCE MANAGEMENT PLAN (RMP) AND ENVIRONMENTAL IMPACT STATEMENT (EIS) FOR THE COEUR d'ALENE FIELD OFFICE, NORTHERN IDAHO

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Please Print Legibly

Name: DAVE CARL GRAHAM
Affiliation (if any): 4 WHEEL DRIVE CLUB
Street Address: 631 W OHIO MATCH RD
City, State, Zip: RATHDRUM ID 83858 Date: 4-10-06

Comments: (Comments may be continued on the back or a separate sheet.)

1 I LIKE TO TRAVEL ON ALL OF THE TRAILS IN THE PINE CREEK AREAS. CALOUSA CREEK, THE PALISADE MINE OVER TO LATOUR CREEK - THE HILAND CREEK AND THE MIDDLE FORK THESE ROADS SHOULD BE OPEN FOR USAGE ALL YEAR AROUND. I HAVE USED ALL OF THEM AT TIMES

Comments must be received by April 14, 2006

P17-1: Thank you for your suggestion. Please see response P16-1.

Comments

P17 (Cont.)

1 I FISH 1974 UNTIL NOW AND SEE NO GOOD REASON FOR CLOSING THEM BECAUSE SOMEONE IN NEW YORK OR LA DONT LIKE HUS USING THE BACKCOUNTRY,

THANKS Dave Graham

(fold here)

Return Address:
DAVE GRAHAM
631 W OHIO MATCH RD.
RATHDRUM ID 83858

SPOKANE WA 992
12 APR 2006 PM 1 T

BLM Coeur d'Alene Field Office
ATTN: RMP
1808 N. Third Street
Coeur d'Alene, ID 83814

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COEUR D'ALENE ID 83814

P18

US DEPARTMENT OF THE INTERIOR, BUREAU OF LAND MANAGEMENT
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Please Print Legibly

Name: Ron Grey

Affiliation (if any):

Street Address: 4810 W. WOODSIDE AVE.

City, State, Zip: Coeur d'Alene, ID 83815 Date: 4/8/06

Comments: (Comments may be continued on the back or a separate sheet.)

1 I WOULD LIKE THE HIGHLAND CREEK AREA TO 4 WHEEL DRIVE. PLEASE LOOK
2 AT KEEPING PINE CREEK AREA OPEN FOR 4 WHEELING. PLEASE KEEP TRAILS
3 AND OPEN

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BUREAU OF LAND MANAGEMENT
COEUR D'ALENE ID 83814

Comments must be received by April 14, 2006

Responses

P18-1: Thank you for your suggestion. Please see response P16-1.

P18-2: Thank you for your suggestion. Please see response P16-1.

P18-3: Thank you for your suggestion. Please see response P16-1.

Comments

P19

Brenda Guettler
<bguettler@yahoo.com>

04/14/2006 07:38 AM

To: ID_CDA_RMP@blm.gov
cc:
Subject: roadless areas comment

I am writing this email today for several reasons.
First, I would like to thank you all for aiming to protect and retain the health of our public lands.
I'd also like to thank you for accepting comments on issues that affect us all.
I feel strongly that our roadless areas be protected and their integrity be maintained. This is only possible when motorized vehicles stay on the trails they are allowed on. Enforcement of this is vital to maintaining healthy ecosystems.

1 I especially feel that the following five trails on Grandmother Mountian should be off limits to ORVs
1.) Lookout Mt./Widow Mt. Trail
2.) Delaney Creek Trail
3.) Lost Lake Trail
4.) Little Lost Lake Trail
5.) Fish Lake Creek Trail

In addition, I feel strongly that Mark's Butte and Pinchot Butte, home to unique ecosystems and without road systems, should be designated as Wilderness Study areas.

Entering roadless areas is a uniques and rare opportunity. These areas demand our protection.

Thank you for taking these comments into consideration, Brenda Guettler
313 S. Main
Moscow, ID 83843

Responses

P19-1: Thank you for your suggestion. Please see response to P1-1.

P20

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Please Print Legibly

Name: STEVE HAIGHT

Affiliation (if any): _____

Street Address: 415 S. PARKWAY DR.

City, State, Zip: CHENEY WA. 99004 Date: 4/8/06

Comments: (Comments may be continued on the back or a separate sheet.)

1 MOTORIZED RECREATION IS #1 TO MY FAMILY, MY SON IS 12 YEARS OLD AND LOVES THE OUTDOORS, HUNTING, ATV RIDING AND SLEDDING PLEASE KEEP AREAS OPEN TO OFF-ROAD RECREATION FOR HIM AND HIS SONS

THANK YOU

RECEIVED
APR 11 2006
BUREAU OF LAND MANAGEMENT
COEUR D'ALENE ID 83814

Comments must be received by April 14, 2006

P20-1: Thank you for your comment.

Comments

P21

David Hall
<deh@moscow.com>

04/14/2006 10:50 AM

To: ID_CDA_RMP@blm.gov
cc:
Subject: Resource Management Plan Revision, North Idaho

ID_CDA_RMP@blm.gov

Re: Resource Management Plan Revision, North Idaho

Grandmother Mountain is the closest roadless area to Moscow. Many residents of Moscow and the Palouse in general, including students from the University of Idaho and Washington State University, use this area to pick huckleberries, seek solace, snowshoe, cross-country ski, day hike, and backpack.

The trails within the Grandmother Mountain roadless area are open to ORV use. This use has become abuse as many motorized users have chosen not to stick to the trail system. It would be great to have the trails in this area closed to motorized use. Due to the high use of this region by primitive recreation enthusiasts, motorized use causes a major conflict.
As it is the closest roadless area to a relatively large population center, its peaceful attributes should be maintained.

1 This area is in large part designated as a Wilderness Study Area, thus should be maintained as nearly as wilderness as is practical. As this is an inventoried roadless area and in part a Wilderness Study Area its ecological integrity may be compromised by increasing motorized abuse

And, as motorized abuse is being reported, clearly motorized use at Grandmother Mountain is not being adequately controlled.

Please prohibit motorized use on 1) Lookout Mt./Widow Mt. Trail, 2) Delaney Creek Trail, 3) Lost Lake Trail, 4) Little Lost Lake Trail, and 5) Fish Lake Creek Trail.

In addition, Mark's Butte and Pinchot Butte Roadless Area should be proposed for Wilderness Study Area designation. Pinchot Butte is home to a unique peat bog ecosystem.

David Hall
1334 Wallen Road
Moscow, ID 83843

April 14,
2006

P22

US DEPARTMENT OF THE INTERIOR, BUREAU OF LAND MANAGEMENT
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Please Print Legibly

Name: Chris Hauck

Affiliation (if any):

Street Address: 403 S Pkwy Dr

City, State, Zip: Cheney WA 99004 Date: 8 Apr 06

Comments: (Comments may be continued on the back or a separate sheet.)

1 Had great time. we should all be able to enjoy the outdoors. There's enough land available for everyone to enjoy. "IT'S MANAGABLE"

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BUREAU OF LAND MANAGEMENT
COEUR D'ALENE ID 83814

Comments must be received by April 14, 2006

Responses

P21-1: Thank you for your suggestion. Please see responses P1-1 and O5-16.

P22-1: Thank you for your comment.

Comments

P23

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US DEPARTMENT OF THE INTERIOR, BUREAU OF LAND MANAGEMENT
DRAFT RESOURCE MANAGEMENT PLAN (RMP) AND ENVIRONMENTAL IMPACT STATEMENT (EIS) FOR THE COEUR d'ALENE FIELD OFFICE, NORTHERN IDAHO

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Please Print Legibly

Name: Neal Hill

Affiliation (if any): Public Land access Veterans (Rep.) Gem Strollers 4X4 Club Lewiston, Id

Street Address: 801 19th

City, State, Zip: Lewiston Id 83501 Date: 4-8-06

Comments: (Comments may be continued on the back or a separate sheet.)

first off, I respect and understand the possible impact of Off-roading to land preservation I do not cross country travel however, I would appreciate continued use of 4-wheeling the trails in my area and four-wheelers. Specifically all of the Pine Creek drainages (Old Shaft, middle fork, Falcon Gulch). Please let us continue our recreational sports. I appreciate your management of the land and continued support for our recreational sport Thank you Neal Hill

1

Comments must be received by April 14, 2006

P24

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COEUR D'ALENE ID 83814

April 13, 2006

Resource Management Plan
Coeur d' Alene Field Office
1808 N. Third Street
Coeur d' Alene, ID 83814
(208) 769-5050 facsimile

RE: BLM Resource Management Plan

I have been told that the BLM is considering or discussing closing the following trails: Palisides Mine Road, Twin Craig's, Latour Creek, Westfork Pine Creek, Middlefork Pine Creek, Highland Creek, Pine Point.

I am a taxpaying member of the public. The public population is increasing. We need more trails of all types, especially of the caliber of the above listed trails, not less.

I am confused. At a time when there are not enough motorized trails the government is considering closing more? Is the intent to close enough to overwork the trails left, so they can all become closed? Will we then need more BLM employees to look over the land no one uses? I am confused?

1

All those trails are necessary to even think about providing a decent trail system in the Coeur d' Alene area. All the trails everywhere, and including this area, are in jeopardy of closure; some I understand due to overuse. It makes no sense to close those listed to make matters worse.

Thank you.

Sincerely,

Debra Houston
5202 Spirit Lake Cutoff Road
Spirit Lake, ID 83869

Responses

P23-1: Thank you for your suggestion. Please see response P16-1.

P24-1: Thank you for your suggestion. Please see response P16-1.

Comments

P25

US DEPARTMENT OF THE INTERIOR, BUREAU OF LAND MANAGEMENT
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Please Print Legibly

Name: TOM INGRAM
Affiliation (if any): SUNSET FOOT RUNNERS
Street Address: 7921 E GRACE
City, State, Zip: SPOKANE Date: 4-8-06

Comments: (Comments may be continued on the back or a separate sheet.)

1 PLEASE KEEP IN MIND ALL OPINIONS CONCERNING CLOSEING OF MIDDLE FORK OF PINE CREEK- INTRESTS OF ALL PARTIES ARE IMPORTANT. - NORTH IDAHO IS ~~FOR~~ A GOOD PLACE TO KEEP TRAILS FOR 4X4 OPEN, BCM WILL KEEP ALL IN MIND. THANKS -

Comments must be received by April 14, 2006

P26

"Holly Jaleski" <admin@aeaassoc.com> 03/13/2006 12:55 PM

To: <scott_pavey@blm.gov>
cc:
Subject: comments on RMP draft

I am on the BLM Resource Advisory Council, serving the Public-at-large.

My comments are as follows:

1 1). Alternate D is a pretty good alternate, though I would like to see less logging, though I understand there are many areas which really have too many trees.

2 2). I live near the Wallace Wildlife Conservation area, and if other BLM areas are treated like that area, then you guys are doing a great job. There is a wide variety of wildlife (cougar, bear, moose, elk, bobcat, and pileated woodpecker) just to name a few. And the forest seems to be very healthy, and not many noxious weeds even though logging has occurred there. If I am reading the RMP correctly there is some logging proposed there, but it really does not need it. There are big healthy trees, and not too much dead wood on the ground. So my suggestion would be to leave that area alone for the next 15 years, and let it continue as it is.

3 3). I would also like to see some licensing requirements put in place for ATV's, since it is the areas where they are allowed that has the biggest noxious weed problems. The licensing monies should be directed towards the noxious weed fund. I know that will be hard to enforce, but maybe the majority would be OK with the fee if it was not unreasonably high and they knew it was going to help combat the noxious weed problem.

4 You guys put on great presentations, and I think you have done a great job, taking into consideration all the different needs of the people who use BLM land.

Thank you,

Holly Jaleski
5051 Wolf Lodge Terrace, Coeur d' Alene, ID 83814
208-665-5888

Responses

P25-1: Thank you for your suggestion. Please see response P16-1.

P26-1: Thank you for your comment.

P26-2: Future management actions in this area could address both of these issues. Forest treatments are proposed at various locations throughout the CDAFO during the next 15-20 years. Once the exact location of these treatments is determined, project-level environmental review will occur and will take into consideration the condition of each proposed treatment area in terms of habitat value, presence of old-growth stands, water quality, fuels and fire potential, and proximity to other sensitive resources.

Under all alternatives forest vegetation treatments are allowed in the Wallace L. Forest Conservation Area. Much of this area was adversely impacted by the 1996 ice storm and bark beetle infestations that followed. In areas where shade tolerant trees dominate, root rot disease is widespread. This area would also be part of the Coeur d'Alene Lake Special Recreation Management Area (SRMA) and would be designated as visual resource management (VRM) Class II under all alternatives. Any treatment would have special restrictions in order to comply with SRMA and VRM management direction.

P26-3: Establishing a federal licensing and registration program was suggested during development of the BLM 2001 National Management Strategy for Motorized Off-Highway Vehicle Use on Public Lands. Such a strategy was rejected since it would "constitute a significant departure from existing federal policy which defers such regulatory matters to state and local agencies" (pg. 9).

P26-4: Thank you for your comment.

Comments

P27

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Please Print Legibly

Name: Pam Katus

Affiliation (if any):

Street Address: 18029 N. Vicki Rd.

City, State, Zip: Rathdrum ID 83858 Date: 4/8/06

Comments: (Comments may be continued on the back or a separate sheet.)

1 I would like to see the BLM ground open to public use for 4 wheel drives and ATVs. We like to spend time on the trails as a family

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P28

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Please Print Legibly

Name: RAY KATUS

Affiliation (if any):

Street Address: 18029 N. VICKI RD.

City, State, Zip: RATHDRUM ID. 83858 Date: 8APR06

Comments: (Comments may be continued on the back or a separate sheet.)

1 I WOULD LIKE TO SEE THE BLM GROUND OPEN TO 4X4's. THE TRAIL RIDES ARE GREAT FUN FOR OUR FAMILIES.

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Comments must be received by April 14, 2006

Responses

P27-1: Thank you for your comment.

P28-1: Thank you for your comment.

Comments

P29

JOHNNY KLETKE <john_kletke@yahoo.com>
02/23/2006 11:14 AM

To: ID_CDA_RMP@blm.gov
cc:
Subject: MANAGEMENT

I have watched with interest on the managment of land in northern Nevada and Southern Idaho. The areas have been destroyed by the lack of good sound management. Junipers are taking over many areas and everythings dies. The area owned by ranching are in much better condition then BLM property.

1 I see BLM land being managed for the benefit of a few environmental people and not the
2 general population. More access should be provided to those areas for use by the general
3 public. Having spent ten years with Idaho Fish and Game I beleive that bioligists input should be decreased since they have formal education but no on the ground experience.

Sincerely

John

P30

Roger Korus <rkorus@uidaho.edu>
04/13/2006 09:18 AM

To: ID_CDA_RMP@blm.gov
cc:
Subject: Grandmother Mountain Area

Dear BLM,

I have visited the Grandmother Mountain area many times during my 27 years in Moscow. I enjoying hiking and camping in the area. Unfortunately, off road vehicle use has worsened the experience. I request that you do your best to eliminate ORV use within the roadless area. The trails should be reserved for hiking and perhaps mountain biking.

1 I especially request that the trails: Fish Lake Trail, Lookout Mt./Widow Mt. Trail, Delaney Creek Trail, Lost Lake Trail, and Little Lost Lake Trail be closed to ORV usage. This is the most convenient roadless area near Moscow and should be better protected.

Thanks for your attention, Roger

Roger Korus
1038 Virginia
Moscow, Idaho 83843

Responses

P29-1: Alternative D has been created to provide access for as wide a variety of users as possible and as diverse a resource base as possible while protecting resources for future benefit. The DRMP includes measures to allow for commodity uses such as timber harvest and mining, diverse recreational opportunities such as OHV use and backcountry hiking, maintenance of fish and wildlife habitat, and protection of physical resources such as water, soil, and vegetation that benefit all citizens.

P29-2: Thank you for your comment.

P29-3: The BLM wildlife biologist assigned to the planning team has 32 years of experience in different field offices of which 15 years have been in northern Idaho. The BLM fisheries biologist assigned to the planning team has 12 years of experience. The BLM botanist assigned to the planning team has 16 years of experience.

P30-1: Thank you for your suggestion. Please see responses to P1-1 and O5-16.

Comments

P31

"Russel J. Leahy" <rjl@ruenyeager.com>

01/18/2006 02:57 PM

To <ID_CDA_RMP@blm.gov>

cc

Subject Draft Resource Management Plan

To whom it may concern,

I have recently read portions of the Draft Resource Management Plan and am somewhat disturbed by the alternatives proposed. Under each alternative, the first highlighted point mentions how to handle the traveling public on BLM land. As this appears as the first point under each alternative, it must be the primary reason for drafting the Draft Resource Management Plan. It can be easily seen that none of the alternatives proposed include increasing the amount of area for use by the traveling public. And by traveling public, I mean the taxpaying OHV users. How could the plan not include an alternative to increase access to these users when the intended purpose of government land is to be used for the benefit of the taxpayers? To me it appears that this alternative was blatantly disregarded. 1

If one were to be confined to the four narrow choices provided in the RMP, my recommendation would have to be for Alternative A. Why is there an RMP to begin with? Judging from reading the report, it would seem you would have to define the problem in order to have a reason to change the existing management plan! The other alternatives proposed are simply not an option. Each one requires the succession of more land for preservation and less for taxpayer recreation. At what point does this constant erosion of our access end? Dare I say when the taxpayers are not allowed access to land anymore? Please choose alternative A or revisit the RMP and include an alternative for increased access. 2 3

Thanks,

Russell J. Leahy, P.E.
Ruen-Yeager & Associates, Inc.
3201 North Huetter Road, Suite 102
Coeur d'Alene, ID 83814
Phone: (208)292-0820
Cell: (208)818-6634
Fax: (208)292-0821

P32

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US DEPARTMENT OF THE INTERIOR, BUREAU OF LAND MANAGEMENT

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Please Print Legibly

Name: James McGovern

Affiliation (if any): North Idaho Trailblazers

Street Address: 15861 Kootenai St., PO Box 134

City, State, Zip: Rathdrum Id 83858 Date: 4-10-06

Comments: (Comments may be continued on the back or a separate sheet.)

being a disabled person, I am limited to places I can go. With road closures from everyone, I am losing access to public lands. I regularly frequent the trails in the pine creek drainage, especially the palisade mine trail and pine creek middle fork trail. I hope to have continued access in the future. 1

Comments must be received by April 14, 2006

Responses

P31-1: Alternative A would provide extensive access for on- and off-road travel (65% of the FO would remain open to off-road travel). However, when considering how best to manage all other resources, including many that are directly or indirectly affected by motorized travel, a balance was reached that will still allow for extensive motorized travel and at the same time allow for maintenance of other types of resources.

P31-2: Thank you for your comment.

P31-3: The purpose and need for the RMP are described in Section 1.2. Impacts of the alternatives on recreational opportunities are described in Chapter 4.

P32-1: Thank you for your comment.

Comments

P33

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Please Print Legibly

Name: Lewis E Miller

Affiliation (if any):

Street Address: 29039 N. Miller Rd

City, State, Zip: Athol ID 83801 Date: 4-8-06

Comments: (Comments may be continued on the back or a separate sheet.)

So many other AREAS hAve great Jep trAils We Need to be competetive w/other regions. Designated Jeep + ATV trAils would bring more money + tourists to our region + give us more to do.

1

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P33-1: Thank you for your comment.

P34

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5

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Please Print Legibly

Name: Jim Nelson

Affiliation (if any): High MTN ATV Assn.

Street Address: 521 Wolf Fork Rd

City, State, Zip: Dayton WA 99328 Date: 2-15-06

Comments: (Comments may be continued on the back or a separate sheet.)

I would urge the implementation of alternative D. Thank you

1

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P34-1: Thank you for your comment.

Comments

P35

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Please Print Legibly

Name: NATHAN OSAL

Affiliation (if any): SPOKANE 4 WHEELERS & NORTH IDAHO TRAILBLAZERS

Street Address: 11717 E 37TH AVE

City, State, Zip: SPOKANE VALLEY, WA 99206 Date: 04/08/2006

Comments: (Comments may be continued on the back or a separate sheet.)

I LIKE TO DRIVE SHORT WHEELBASE VEHICLES (EXTREME 4 WHEEL DRIVE), SPECIFICALLY TO ROCK-CRAWL ON THE FOLLOWING ROADS & DRAINAGE AREAS: MIDDLE FORK OF PINE CREEK, THE HIGHLAND CREEK DRAINAGE, THE PALISADES MINE ROAD INCLUDING PAST THE MINE AND UP AND OVER THE DIVIDE TO ~~SIDE~~ THE LATOUR CREEK SIDE, THE MIRROR LAKE AND LAKE ELSIE AREAS, AND KALOOSA CREEK. I WOULD

Comments must be received by April 14, 2006

P35 (Cont.)

ESPECIALLY ~~SPECIFICALLY~~ LIKE TO SEE THE FOLLOWING TRAILS RE-OPENED

1 TO SHORT WHEELBASE VEHICLES FOR "EXTREME 4 WHEEL DRIVE" USE. THE DIVIDE TRAIL, BOULDER CREEK, ATLAS MINE ROAD, AND FROST PEAK. I ALSO LIKE TO USE THE HIGHLAND CREEK ARE.

(fold here)

Return Address:

BLM Coeur d'Alene Field Office
ATTN: RMP
1808 N. Third Street
Coeur d'Alene, ID 83814

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APR 11 2006
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COEUR D'ALENE ID 83814

Responses

P35-1: Thank you for your suggestion. Please see response P16-1.

Also, as shown on Map 37 (Draft), the Boulder Creek and Frost Peak Roads are designated routes without restrictions. The Atlas Mine Road is shown with vehicle class restrictions. There is no resource management reason for this, so the RMP is changed to show this as a designated route without restrictions (Map 37, Final). Vehicle class restrictions remain proposed for the Coeur d'Alene/ St. Joe Divide Trail. Restrictions are consistent with the current width and easement constraints on the route.

Comments

P36

"Mike Pearson" <mike@anateklabs.com>
04/13/2006 10:01 AM

To: <ID_CDA_RMP@blm.gov>
cc:
Subject: Trail abuse by 4-wheelers

Hello,

I'm a lifelong resident of Idaho, and have lived in the Moscow area since 1980. I'm an avid outdoor enthusiast. I hike, mountain bike, ski, and fish in the most beautiful state in the union: Idaho.

I spend much of my time hiking and cycling in the Freeze-out area off of FR 301.

In the last 4 years, all trails in this area have been decimated by 4-wheel motorized vehicles. This use group skirts gate closures and has put in new trails to the summit of Grandfather Mountain (I rode my bicycle down these eroded trenches last summer). The trail between Grandfather and Grandmother mountain is trashed, as is most of the "Historic" Delaney Creek Trail all the way to Marble Creek.

Being an avid bicycler, I would have no problem with this area being closed to everything but foot traffic, but I favor a complete ban on all 4 and 3 wheel motorized traffic. These machines widen trails, create massive erosion, and in my opinion should be restricted to roads designed for car travel.

1 I have seen a huge negative impact on the following trails:

Lookout Mountain/Widow Mountain trails
Gold Center Trail (This one is a freeway) Delaney Creek Trail Lost Lake and Little Lost Lake Trails Fish Lake trail All Trails on top of Grandmother and Grandfather Mountains (Grandfather Mountain is being devastated on its west slopes).

2 PLEASE KEEP 4-WHEELERS OFF OF OUR TRAILS - NOBODY WANTS THIS USE GROUP ON SINGLE TRACK TRAILS INCLUDING THE TWO WHEEL MOTORIZED CROWD, HORSE RIDERS, HIKERS, AND BICYCLERS.

Freezeout is a beautiful area all times of year. The "no-motorized vehicles" posted signs at freeze-out saddle last year were torn down, and driven by. There are responsible 4-wheeler riders out there and they keep to roads and unrestricted areas which are plentiful in Idaho.

Thank you for your time.

Mike Pearson
Laboratory Director
Anatek Labs, Inc.
1282 Alturas Drive
Moscow, ID 83843
(208)883-2839

P37

Diane/Al Prorak/Poplawsky <dial@moscow.com>
04/16/2006 05:36 PM
Please respond to dial@moscow.com

To: ID_CDA_RMP@blm.gov
cc:
Subject: BLM RMP comments

April 16, 2006

Bureau of Land Management:

I am writing to comment on the revision of your Resource Management Plan as it relates to management in the Grandmother Mtn. Roadless Area.

I realize I am a few days past the deadline, however due to knee surgery last week this is the first day I have been able to attend to this matter.

The Grandmother Mtn. roadless area has a long traditional usage by non-motorized recreational users. we, along with friends and family hike in the area at least a few times each year - for at least the past
16 years -, and used to ski up on Marks Butte in the winter before snowmobiles were made powerful enough to get up there and completely ruin the solitude and the experience.

Starting about 5 years ago, the motorized use in the area started becoming so excessive that our activities and those of others have become much less enjoyable. There is almost the constant whine of motors to be heard, and oftentimes the motorized users fly past (sometimes dangerously fast) in a terrible racket of noise and dust.
One must literally listen for them coming and jump out of the way on time. There is terrible resource damage in some areas with numerous two-tracks created and very deep ruts with very deep dust instead of ground. I am also aware of illegally constructed ORV trails in the area.

1 Motorized use has got completely out of hand in this area.

Although much of this area is Wilderness Study Area, two parts with unique ecosystems (Mark's Butte and Pinchot Butte) are not and should be thus designated. The excessive motorized abuse of the WSAs and potential WSAs is a serious threat to the potential wilderness status of these areas.

Due to these problems, motorized use should be banned in the WSAs and also the Lookout Mtn/Widow Pk trail, Delaney Crk trail, Lost Lake Trail, Little Lost Lake Trail, and Fish Lake Creek Trail.

Thank you for considering these comments.

Sincerely,

Al Poplawsky/Diane Prorak
2108 Vandal Dr.
Moscow, ID 83843

Responses

P36-1: Thank you for your suggestion. Please see response to P1-1. Your comment letter mentioned OHV damage specifically on Grandmother and Grandfather Mountains and Gold Center Trail among other places. Please be aware that the western portion of the Grandmother Mountain Wilderness Study Area, which includes Grandmother and Grandfather Mountains, was transferred by Congress to the U.S. Forest Service by the Arkansas-Idaho Land Exchange Act of 1992. BLM no longer has management authority over this western portion of the WSA and our travel restrictions do not apply to it. Also, Gold Center Trail is a Forest Service Trail.

P36-2: Thank you for your suggestion. Please see response P1-1.

P37-1: Please see responses P1-1 and O5-16.

Comments

P38

fred Rabe
<fredr@uidaho.edu
>

04/13/2006 10:07 AM

To: Id_CDA_RMP@blm.gov, foc@wildrockies.org

cc:

Subject: Grandmother Mountain area

I have done inventory work with Chuck Wellner a number of years ago in the Mark's Butte and Pinchot Butte areas. These fascinating wetland sites need to be protected as natural areas. Motorized use should somehow be excluded from this fragile ecosystem. Please close the following trails to ORV use: Lookout Mt./Window Mt., Delaney Creek, Lost Lake, Little Lost Lake and Fish Lake Creek. I may continue to study the aquatic sites - lakes, ponds, wetlands in the BLM Grandmother Mountain Roadless Area this summer. 1

Fred Rabe

P39

Dave Remington
<gray73_2000@yah
oo.com>

03/30/2006 10:59 AM

To: ID_CDA_RMP@blm.gov

cc:

Subject: Draft Environmental Impact Statement (EIS) - Comments due by April 13

DATE: 30 March 2006

TO: CDA BLM Field Office BLM Coeur d'Alene Field Office
ATTN: RMP
1808 North Third Street
Coeur d'Alene, ID 83814
Email:ID_CDA_RMP@blm.gov
Fax: 208-769-5050

FROM: David Gray Remington, Moscow Idaho (contact info in signature below)

SUBJECT: My comments on draft EIS due by April 13th

I request that the following be considered in revising the draft EIS:

1) Support additions to Wilderness Study Area network, and protect wilderness values in all WSAs 1
2) Ensure with specific provisions that motorized users are required to stay on designated roads and trails 2
3) Support additions to the Areas of Critical Environmental Concern network 3
4) Modify Alternative D to reflect a compromise between Alternative B (Commodity emphasis) and Alternative C (Conservation emphasis) 4
5) Reduce the acres of land identified for sale or exchange 5

David Gray Remington
Cybrarian, Info Guide & Scout, & Wilderness Preserver (somewhat ret. :-)
Email: gray73_2000@yahoo.com
Snail: 536 Ridge Road, Moscow, ID 83843
Telamaphone: (cell!) 208-691-7943

Responses

P38-1: Thank you for your suggestion. Please see response to P1-1.

The proposed action would expand the Lund Creek Research Natural Area to include Pinchot Marsh (see Map 55).

P39-1: Thank you for your suggestion. Please see response to P1-1.

P39-2: Thank you for your suggestion. Please see response to P16-1.

P39-3: Thank you for your comment.

P39-4: Alternative D is somewhat of a compromise between Alternatives B and C. However, Alternative D also incorporates measures to mitigate potential impacts that BLM identified from preliminary analysis of Alternatives A, B, and C. It also incorporates new information that became available after development of the other three alternatives.

P39-5: The area identified as available for adjustment is simply an estimate of BLM-administered lands that do not meet the criteria for acquisition/retention. The criteria would be used to determine whether to retain, acquire, or adjust lands.

Comments

P40

Melissa Sanborn <sanbornma@yahoo.com>
04/13/2006 02:51 PM

To: ID_CDA_RMP@blm.gov
cc:
Subject: Grandmother Mountain Roadless Area/Trails

Dear BLM,

I have been a Moscow, Idaho resident for four years and am an avid fan of the outdoors. I enjoy the outdoors because they provide an escape from the obnoxious pace that most of us live in day in and day out. However, it is often difficult to enjoy the landscapes of the outdoors due to motorized recreational vehicles. Not only do these vehicles allow for recklessness on sacred wildlife land, they disturb the peace of the outdoors and distract from its true serenity. It has been brought to my attention that Grandmother Mountain Roadless Area will will be affected by the revision of the BLM's Resource Management Plan. Widow Mountain Trail, Delaney Creek Trail, Lost Lake Trail, Little Lost Lake Trail, and Fish Lake Creek Trail are sacred parcels of land to trail-hikers, backpackers and skiers. It is vital that these trails and this land be closed off to off-road/motorized vehicles to protect the integrity of an area that is enjoyed by so many local residents. 1

Please consider this email in the revision of Grandmother Mountain Roadless Area - help protect the wildlife of the area and the trails for true outdoor enthusiasts.

Thank you,
Melissa Sanborn

P41

"Ted Scherff" <tedscherff@hotmail.com>
04/13/2006 08:15 AM

To: ID_CDA_RMP@blm.gov
cc:
Subject:

I wish to comment on the RMP regading the lands of Idaho administered by the BLM:

Motorized recreationists are destroying many areas of Idaho with overly intensive and indiscriminite activity. In the Grandmother Mountain area the Lookout Mt./Widow Mt. Trail, Delaney Creek trail, Lost trail, Little lost Lake trail, and fish lake creek tails are badly damaged by motorized users. 1
These trails should be closed to motorized activity.

Most certainly, areas under Wilderness Study should be off-limits to motorized recreation. The past has shown that the old tactic of allowing degrading activity inside "Wilderness Study" areas for the purpose of degradation so the areas will not meet "wilderness" criteria, has back-fired on BLM and other federal resource management agencies and discredited the associated employees. This is shamful!

1 Marks Butte and Pinchot Butte should be designated as Wilderness Areas.

Sincerely,

Ted L. Scherff

Responses

P40-1: Thank you for your suggestion. Please see response to P1-1.

P41-1: Thank you for your suggestion. Please see response to P1-1.

Comments

P42

US DEPARTMENT OF THE INTERIOR, BUREAU OF LAND MANAGEMENT
DRAFT RESOURCE MANAGEMENT PLAN (RMP) AND ENVIRONMENTAL IMPACT STATEMENT (EIS) FOR THE COEUR d'ALENE FIELD OFFICE, NORTHERN IDAHO

Public Comment Card

Please use this comment card to submit input regarding the project alternatives and potential environmental impacts of the RMP as identified in the EIS. Please include any sources of relevant data or information that you feel may enhance this document. Written comments must be received by April 14, 2006.

Comments can be submitted in the following ways:

1. Turn in today at the Public Meeting; or
2. By US Mail addressed to BLM Coeur d'Alene Field Office, ATTN: RMP, 1808 N. Third Street, Coeur d'Alene, ID 83814 ; or
3. By E-mail to ID_CDA_RMP@blm.gov; or
4. By Fax to (208) 769-5050.

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Please Print Legibly

Name: David Serwat

Affiliation (if any): North Idaho Trail Riders

Street Address: 7345 Crenshaw

City, State, Zip: Rathdrum, ID 83858 Date: 4/8/06

Comments: (Comments may be continued on the back or a separate sheet.)

1 Please Designate the Pine Creek area and Latour Creek areas ~~and~~ for 'Jeeping'.

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BUREAU OF LAND MANAGEMENT
COEUR D'ALENE ID 83814

Comments must be received by April 14, 2006

P43

"Gretchen Stewart" <gretchen.stewart@gmail.com>

To: ID_CDA_RMP@blm.gov

cc:

04/14/2006 07:12 AM

Subject: Comments

Hello there.
I'm a Grandmother and a Grandmother Mountain enthusiast. I've hiked there and picked huckleberries there and enjoyed the solitude and beauty. I plan to continue using this area close to my home for at least two more decades.

1 Motorized use of this area is inappropriate because BLM cannot enforce the current uses allowed for motorized vehicles. Some motorized users are abusing the area and destroying the values that the area is best suited for--like primitive hiking, solitude, quiet, wilderness and roadless experiences. Furthermore, those motorized abusers are degrading the land and lowering the chances for the roadless area to become eligible for designated Wilderness.

1 I urge the BLM to please close the following trails to motorized use:
Lookout Mt./Widow Mt. Trail, Fish Lake Creek Trail, Little Lost Lake Trail, Lost Delaney Creek Trail, and Lost Lake Trail.

Also, Mark's Butte and Pinchot Butte are perfect candidates for designation as Wilderness Study Areas. Please recognize their unniqueness. I nominate them! Will you?

Thank you,
Gretchen Stewart
411 South Hayes
Moscow, Idaho 83843

Responses

P42-1: Thank you for your suggestion. Please see response P16-1.

P43-1: Thank you for your suggestion. Please see response P1-1.

Comments

P44

US DEPARTMENT OF THE INTERIOR, BUREAU OF LAND MANAGEMENT
DRAFT RESOURCE MANAGEMENT PLAN (RMP) AND ENVIRONMENTAL IMPACT STATEMENT (EIS) FOR THE COEUR d'ALENE FIELD OFFICE, NORTHERN IDAHO

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Please Print Legibly

Name: FANOY WATSON

Affiliation (if any): _____

Street Address: 9726 KALEN AVE

City, State, Zip: HAYDEN LAKE ID Date: 4/8/06

Comments: (Comments may be continued on the back or a separate sheet.)

1 Pine creek, middle fork is where we like to trail ride, please keep this area open for public use.

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COEUR D'ALENE ID 83814

Comments must be received by April 14, 2006

P44-1: Thank you for your suggestion. Please see response P16-1.

P45

Susan Westervelt
<suew@uidaho.edu>

04/14/2006 04:36 PM

To: ID_CDA_RMP@blm.gov
cc:
Subject: Resource Mgmt Plan

To Whom It Concerns.

As an Idaho native and one who visits the Grandmother Mountain area regularly for hiking, camping, photography, huckleberry picking and the remote scenic beauty of the area, it is of great concern to me that the revised management plan give the area proper protection. The area is part of the inventoried roadless lands and includes some Wilderness Study designation and it is imperative that ORV use be curtailed. The last time I was up there, the damage done by rampant off-road vehicle use was unsightly and radical. ORV use is a scourge on the landscape and ecologically destructive. At a minimum, the following trails should be closed to ORV use: Delaney Creek, Fish Lake Creek, Little Lost Lake, Lost Lake, and Lookout Mtn/Widow Mtn.

1 In addition to protecting the trails on Grandmother Mountain, Mark's Butte and Pinchot Butte qualify for Wilderness Study designation.
There are no road systems, and the unique ecosystems of both areas deserve our formal protection.

Sincerely,

Susan Westervelt
PO Box 223
Deary, ID 83823

P45-1: Thank you for your suggestion. Please see response to P1-1.

Responses

Comments

P46

US DEPARTMENT OF THE INTERIOR, BUREAU OF LAND MANAGEMENT
DRAFT RESOURCE MANAGEMENT PLAN (RMP) AND ENVIRONMENTAL IMPACT STATEMENT (EIS) FOR THE COEUR d'ALENE FIELD OFFICE, NORTHERN IDAHO

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Please Print Legibly

Name: Crystal Westphal

Affiliation (if any):

Street Address: 29550 N Miller Rd.

City, State, Zip: Athol ID 83801 Date: 4-8-06

Comments: (Comments may be continued on the back or a separate sheet.)

1 I would love to see more jeep + ATV trails. My husband + I have really enjoyed some of the trails in Washington + other States. I think that it would do a lot for our N. Idaho region if we had more designated trail areas. It would bring more people + business to our area

1

Comments must be received by April 14, 2006

P47

US DEPARTMENT OF THE INTERIOR, BUREAU OF LAND MANAGEMENT
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Please Print Legibly

Name: Paul Westphal

Affiliation (if any):

Street Address: 29550 miller Rd

City, State, Zip: Athol ID 83801 Date: 04-08-06

Comments: (Comments may be continued on the back or a separate sheet.)

1 would like to see more land managed to accomodate four wheel drive enthusiests and ATV vehicles alike. I feel this would support the local economy of small towns in the designated areas by bringing more people into the areas to buy things. I enjoy the trail systems of Washington often and would like to see more in Idaho panhandle region.

Comments must be received by April 14, 2006

Responses

P46-1: Thank you for your suggestion. Please see response P16-1.

P47-1: Thank you for your suggestion. Please see response P16-1.

Comments

P48

US DEPARTMENT OF THE INTERIOR, BUREAU OF LAND MANAGEMENT
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Please Print Legibly

Name: Bill & BARB WHITE

Affiliation (if any): BACKCOUNTRY ATV ASSO

Street Address: E. 11510 NUNN RD

City, State, Zip: ATHOL, IDA 83801 Date: 2-14-06

Comments: (Comments may be continued on the back or a separate sheet.)

1 WE GO WITH ALTERNATIVE D. FROM WHAT I'VE SEEN IT GOES WITH THE F.S PLAN.

RECEIVED
FEB 17 2006
BUREAU OF LAND MANAGEMENT
COEUR D'ALENE ID 83814

Comments must be received by April 14, 2006

P49

RECEIVED
FEB 08 2006
BUREAU OF LAND MANAGEMENT
COEUR D'ALENE ID 83814

Back Country ATV Association
Policy Statement on the Resource Management Plan
For the
Idaho BLM Couer d' Alene Field Office

I am Bill White of Back Country ATV Association of the Couer d' Alene area. I represent over 250 active members and 32 Associated Business Members in this area.

Back Country ATV Association is an organization dedicated to keeping our public lands *open*. By working with state, federal, and private organizations we can secure long-term usage which benefits all trail users. We actively oppose any laws and regulations that are determined to be detrimental to the best interest of our members. We look for ways to support other ATV clubs that shares mutual goals and objectives, hence expanding our ATV community. We also take environmental concerns seriously. We assist in trail clearing efforts, having our volunteer labor augment the primary agency resources. Back Country ATV believes public lands should be left in the same condition or better upon completion of our organized rides.

I want to acknowledge the BLM and all the Clubs and Associations that have been working on this Planning Process for the past 2 years. I commend you on the hard work and the resulting Documents are proof of this. It is a very important milestone you have all reached and is a compliment to the existing Federal Land Policy Act of 1976, and is proof that the work that has gone into this planning process will survive for the next 20 years.

1 Upon review by our membership, of this Draft RMP/EIS, and in keeping within the function of our club to interface with local, state and federal governmental organizations, to help us assure equal rights in the National Forest, we endorse the **Alternative D** the (Preferred Alternative) as presented, as we also feel that it represents the best mix and variety of management actions, to resolve the planning issues, and to achieve a balance between all the user groups involved. We are grossly opposed to the BLM taking no action as in Alternative A, as it will be to prohibited, when it comes time for implementing management measures needed to address our concerns, related to the
2 growing recreational uses we enjoy, and the adverse impact on the local economies of our area. We acknowledge some of the constrains this alternative impacts, but concede to the fact that we must be flexible in the decision making in order to continue to use our public lands.

I thank for this opportunity to speak before you at this public hearing and to comment on this document.

February 7, 2006

Responses

P48-1: Thank you for your comment.

P49-1: Thank you for your comment.

P49-2: Thank you for your comment.

Comments

P50

"The Williams" <rajw@omnicast.net>

04/15/2006 08:44 AM

To <ID_CDA_RMP@blm.gov>

cc

Subject 4x4 trail closuers

I have been informed of 4x4 trail closures in the following areas.
Palisides Mine Road
Twin Craig,s
Latour Creek
Westfork Pine Creek
Middlefork Pine Creek
Highland Creek
and Pine Point.
Why? The 4x4 community would be more than happy to help maintain any of these trails to keep them open for our sport. Why not let the groups in the
4x4 arena get involved to keep these trails available to use?
What does closing them achieve? Let the 4x4 groups know what the problems are so we can be better educated on the needs of the areas involved, and then provide people to help with whatever would be required to maintain these trails and roads. 1

Dick Williams
6122 N 'G' st.
Spokane WA. 99205

Responses

P50-1: Thank you for your suggestion. Please see response P16-1.

P51

RECEIVED 4
FEB 1 6 2006
BUREAU OF LAND MANAGEMENT
COEUR D'ALENE ID 83814

US DEPARTMENT OF THE INTERIOR, BUREAU OF LAND MANAGEMENT
DRAFT RESOURCE MANAGEMENT PLAN (RMP) AND ENVIRONMENTAL IMPACT STATEMENT (EIS) FOR THE COEUR d'ALENE FIELD OFFICE, NORTHERN IDAHO

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Please Print Legibly

Name: JERRY L. WILLIS
Affiliation (if any): CdA SNOWMOBILE (& STATE) - ACCESS ALIANCE BACK COUNTRY ATV - GEM STATE ATV
Street Address: 1093 N. MORNING DR
City, State, Zip: POST FALLS, ID 83854 Date: 02-08-06

Comments: (Comments may be continued on the back or a separate sheet.)

I WANT ACCESS TO PINE CREEK FROM LATOUR CREEK, VIA THE TWIN CRAIGS ROAD. PINE CREEK WAS CLOSED FOR HUNTING, BUT THE LOCALS ARE HUNTING IT AND BRAGGING ABOUT IT. 1

WE NEED MORE AREAS FOR ATV's, ETC. IF WE CAN'T HAVE FULL ACCESS TO OUR PUBLIC LANDS, SELL IT SO THERE WILL BE TAXES PAID ON IT. 2

Comments must be received by April 14, 2006

P51-1: Thank you for your suggestion. Please see response P16-1.

P51-2: When considering how best to manage all resources, including many that are directly or indirectly affected by motorized travel, a proposed balance was reached that will still allow for extensive motorized travel and at the same time allow for maintenance of other types of resources.

Comments

P52

US DEPARTMENT OF THE INTERIOR, BUREAU OF LAND MANAGEMENT
DRAFT RESOURCE MANAGEMENT PLAN (RMP) AND ENVIRONMENTAL IMPACT STATEMENT (EIS) FOR THE COEUR d'ALENE FIELD OFFICE, NORTHERN IDAHO

7

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Please Print Legibly

Name: WAYNE C WILLIS

Affiliation (if any): HIGH MTN ATV ASSN / GEM STATE ATV ASSN

Street Address: P O Box 52

City, State, Zip: OSBURN IDAHO, 83849 Date: 2/15/06

Comments: (Comments may be continued on the back or a separate sheet.)

1| I SUPPORT ALTERNATIVE "D"

RECEIVED
FEB 17 2006
BUREAU OF LAND MANAGEMENT
COEUR D'ALENE ID 83814

Comments must be received by April 14, 2006

P53

"Robin Woods" <rwoods@alturasanalytics.com>
04/14/2006 11:49 AM

To <ID_CDA_RMP@blm.gov>
cc
Subject Freezeout Ridge

Hello,

I have lived in the Moscow, Idaho area since 1980 and I am an avid outdoor enthusiast. I enjoy hiking, mountain biking, and skiing in the most beautiful state in the union: Idaho. I spend much of my time hiking and cycling in the Freeze-out area off of FR 301.

In the last 4 years, all trails in this area have been decimated by 4-wheel motorized vehicles. This use group skirts gate closures and has put in new trails to the summit of Grandfather Mountain (I rode my bicycle down these eroded trenches last summer). The trail between Grandfather and Grandmother mountain is trashed, as is most of the "Historic" Delaney Creek Trail all the way to Marble Creek.

Being an avid bicycler, I would have no problem with this area being closed to everything but foot traffic, but I favor a complete ban on all 4 and 3 wheel motorized traffic. These machines widen trails, create massive erosion, and in my opinion should be restricted to roads designed for car travel.

I have seen a huge negative impact on the following trails:

Lookout Mountain/Widow Mountain trails

1 Gold Center Trail (This one is a freeway)

Delaney Creek Trail

Lost Lake and Little Lost Lake Trails

Fish Lake trail

All Trails on top of Grandmother and Grandfather Mountains (Grandfather Mountain is being devastated on its west slopes).

Responses

P52-1: Thank you for your comment.

P53-1: Thank you for your suggestion. Please see response P1-1.

Your comment letter mentioned OHV damage specifically on Grandmother and Grandfather Mountains and Gold Center Trail among others. Please be aware that the western portion of the Grandmother Mountain Wilderness Study Area which includes Grandmother and Grandfather Mountains was transferred by Congress to the U.S. Forest Service by the Arkansas-Idaho Land Exchange Act of 1992. BLM no longer has management authority over this western portion the WSA and our travel restrictions do not apply to it. Gold Center Trail is a Forest Service Trail.

Comments

P53 (Cont.)

2 PLEASE KEEP 4-WHEELERS OFF OF OUR TRAILS - NOBODY WANTS THIS USE GROUP ON SINGLE TRACK TRAILS INCLUDING THE TWO WHEEL MOTORIZED CROWD, HORSE RIDERS, HIKERS, AND BICYCLERS.

Freezeout is a beautiful area all times of year. The "no-motorized vehicles" posted signs at freeze-out saddle last year were torn down, and many non-responsible 4-wheeler enthusiasts drove past them. There are responsible 4-wheeler riders out there and they keep to roads and unrestricted areas, which are plentiful in Idaho.

Thank you,

Robin Woods

****
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Alturas Analytics, Inc.
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F 208.882.9246
email rwoods@alturasanalytics.com

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****

Responses

P53-2: Thank you for your suggestion. Please see response to P1-1.

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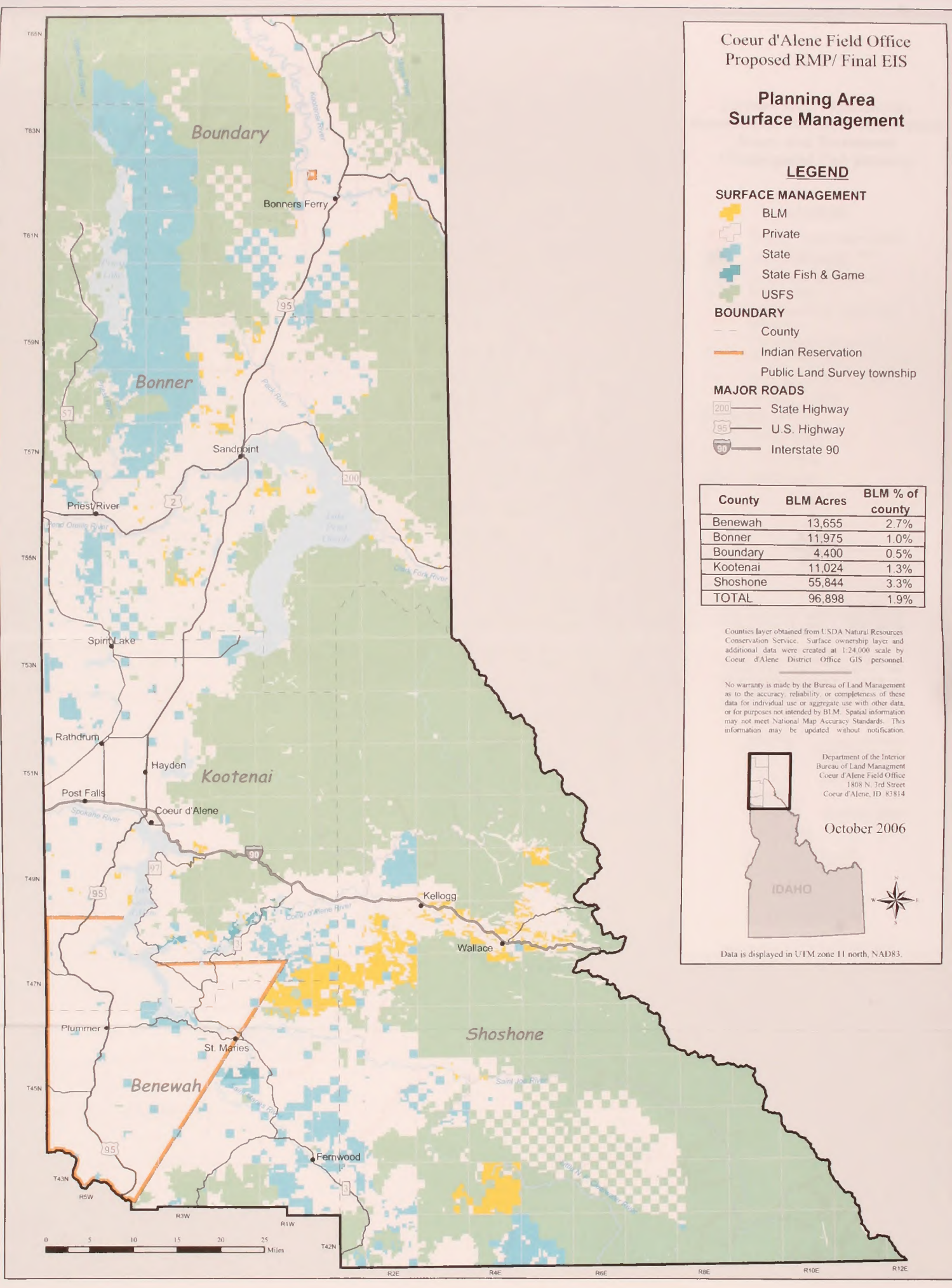

Coeur d'Alene Field Office
Proposed RMP/ Final EIS

Planning Area Surface Management

LEGEND

SURFACE MANAGEMENT

- BLM
- Private
- State
- State Fish & Game
- USFS

BOUNDARY

- County
- Indian Reservation
- Public Land Survey township

MAJOR ROADS

- State Highway
- U.S. Highway
- Interstate 90

County	BLM Acres	BLM % of county
Benewah	13,655	2.7%
Bonner	11,975	1.0%
Boundary	4,400	0.5%
Kootenai	11,024	1.3%
Shoshone	55,844	3.3%
TOTAL	96,898	1.9%

Counties layer obtained from USDA Natural Resources Conservation Service. Surface ownership layer and additional data were created at 1:24,000 scale by Coeur d'Alene District Office GIS personnel.

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Department of the Interior
Bureau of Land Managment
Coeur d'Alene Field Office
1808 N. 3rd Street
Coeur d'Alene, ID 83814

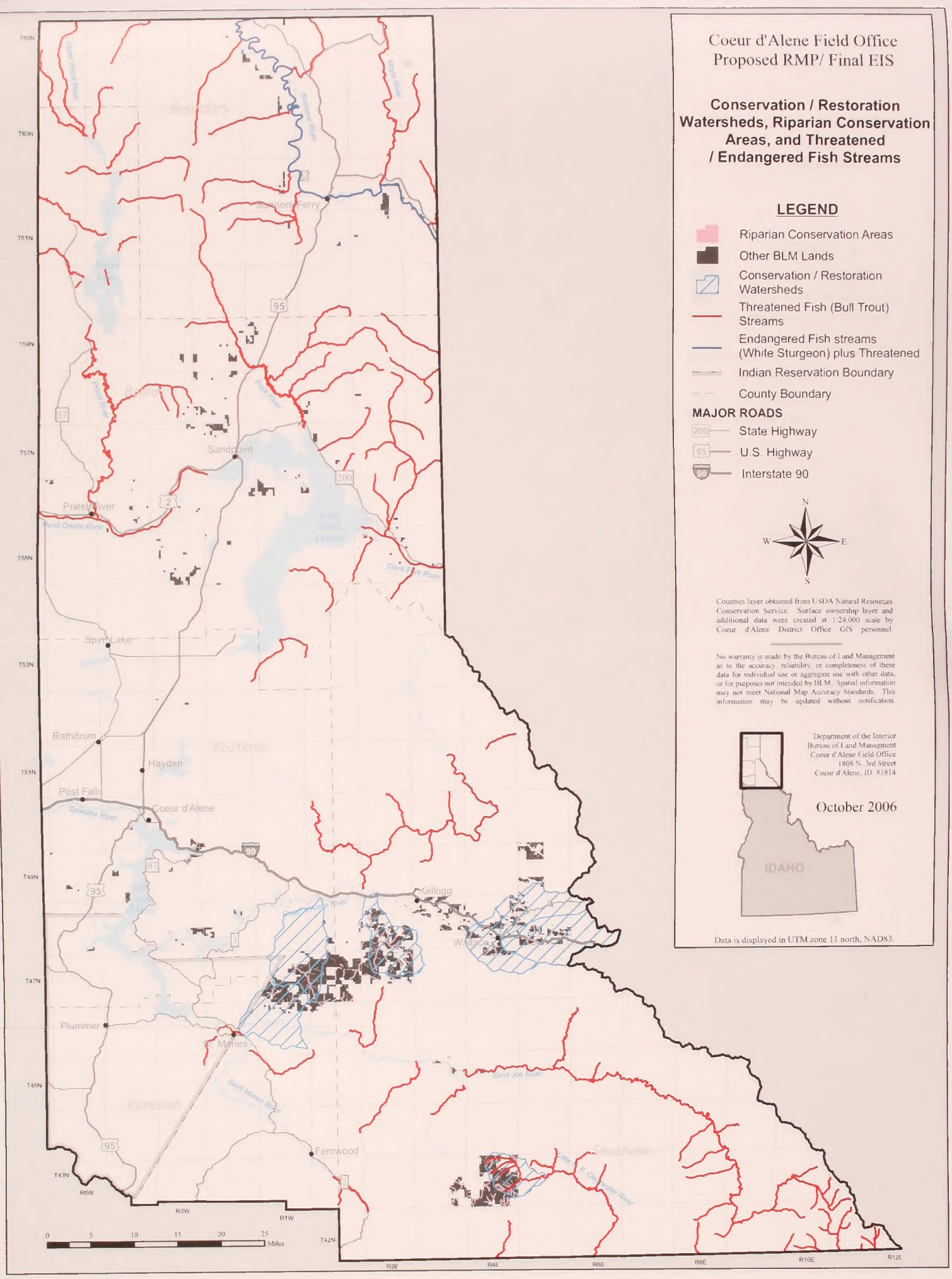
October 2006

Data is displayed in UTM zone 11 north, NAD83.

U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

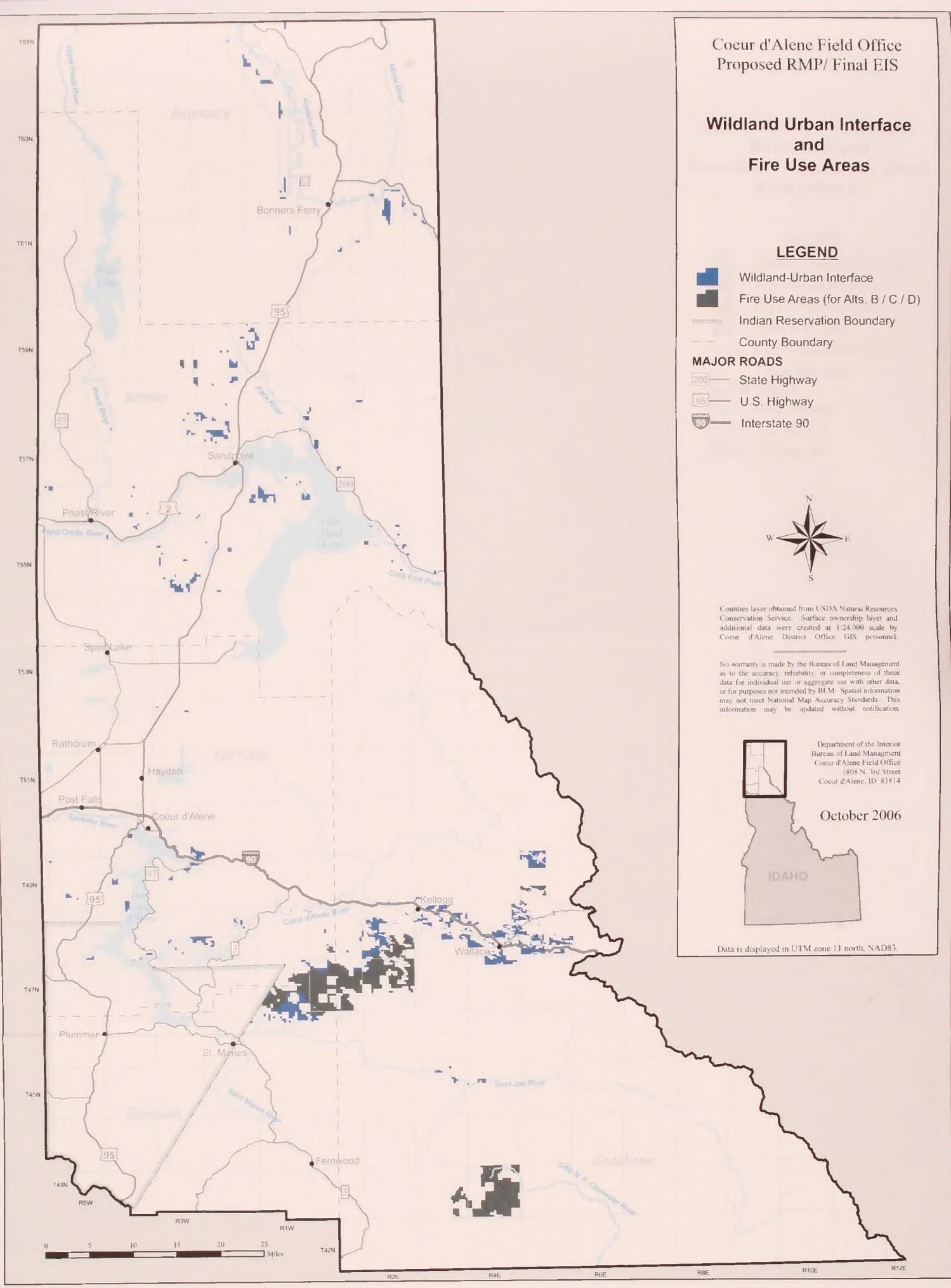
Planning Area Surface Management

Map 1



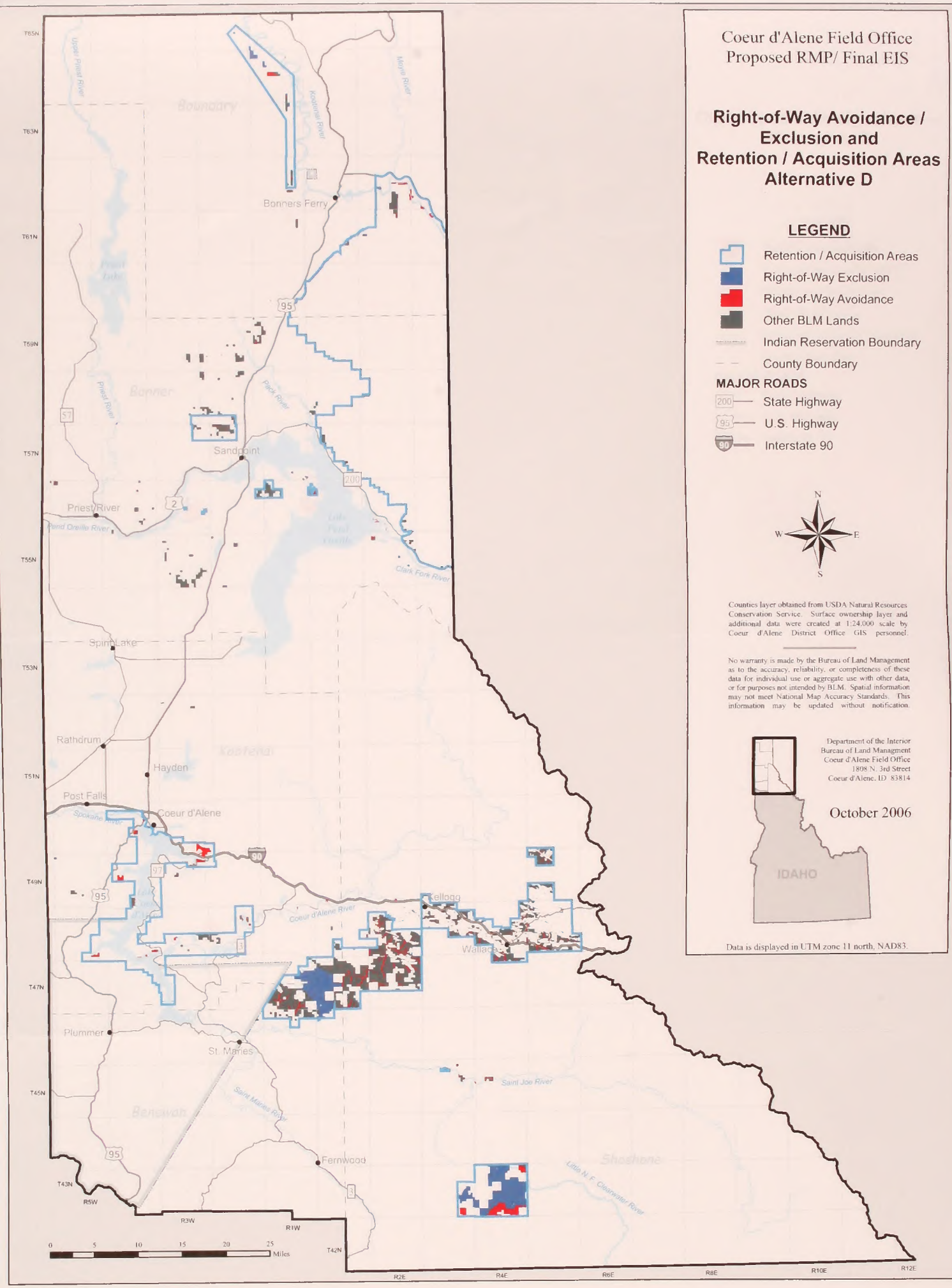
Conservation / Restoration Watersheds, Riparian Conservation Areas, and Threatened / Endangered Fish Streams

Map 3



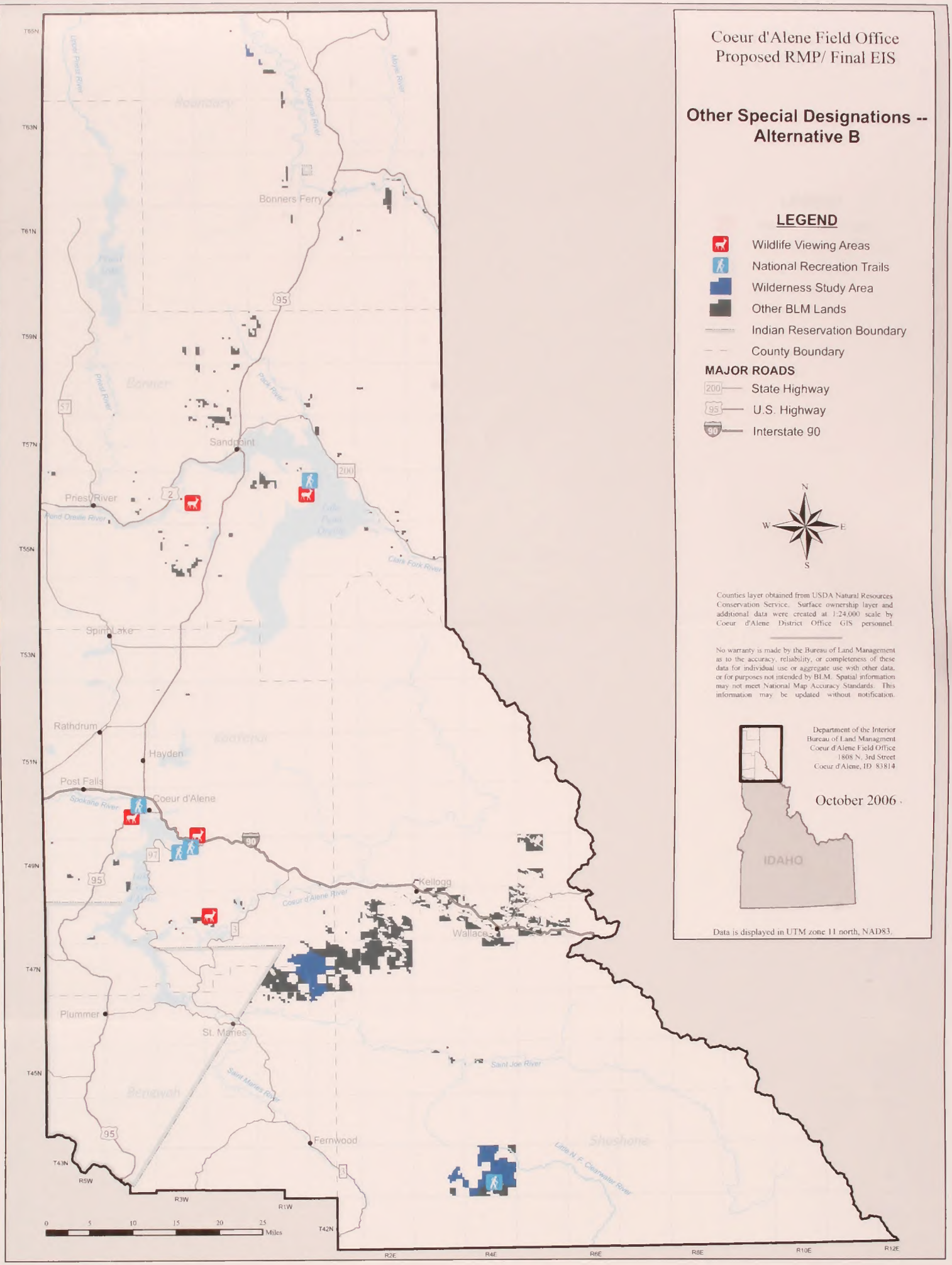
Wildland Urban Interface and Fire Use Areas (Areas will be considered "Fire Use" in Alternatives B, C and D only.)

Map 5



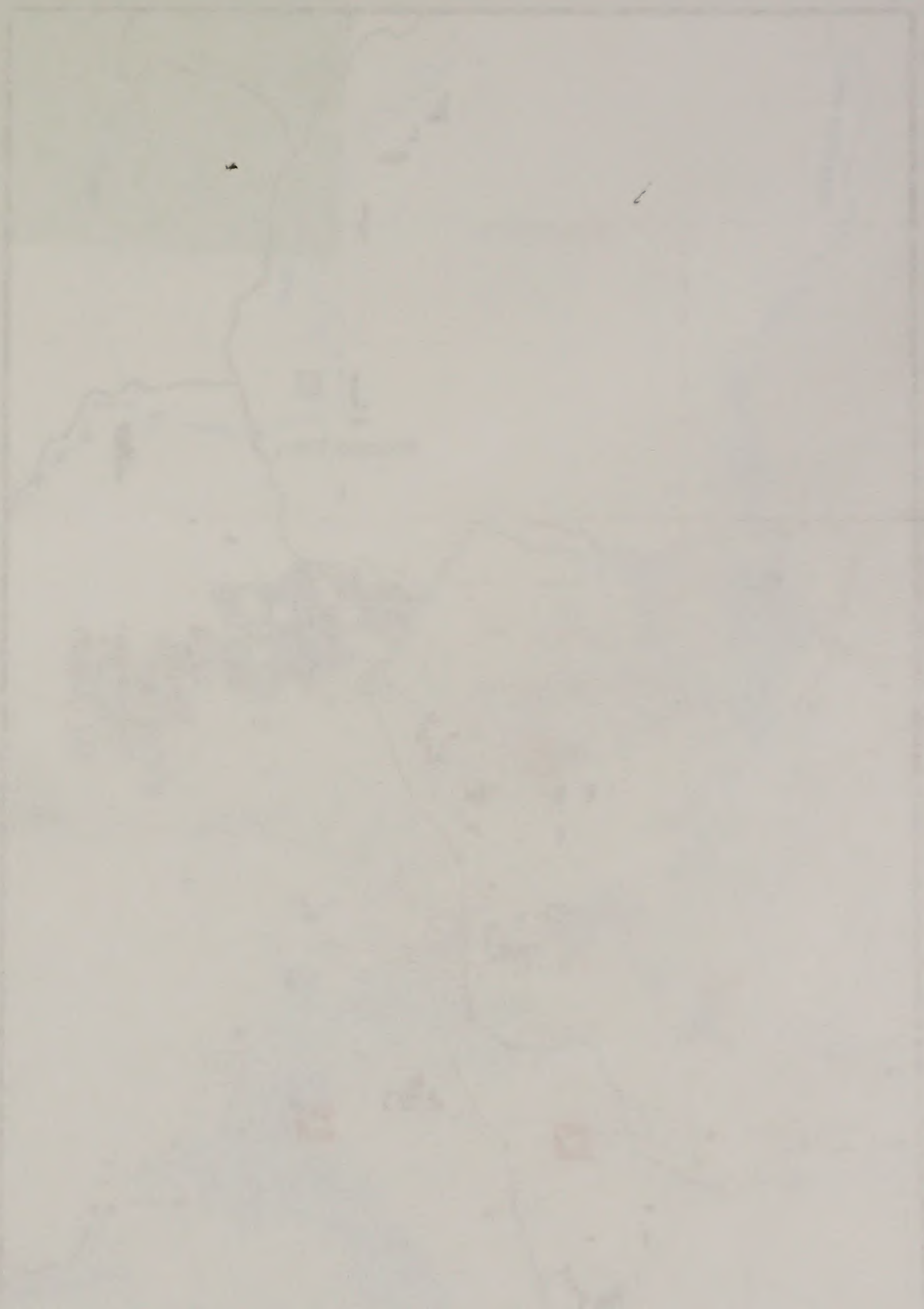
Right-of-Way Avoidance / Exclusion and Retention / Acquisition Areas Alternative D

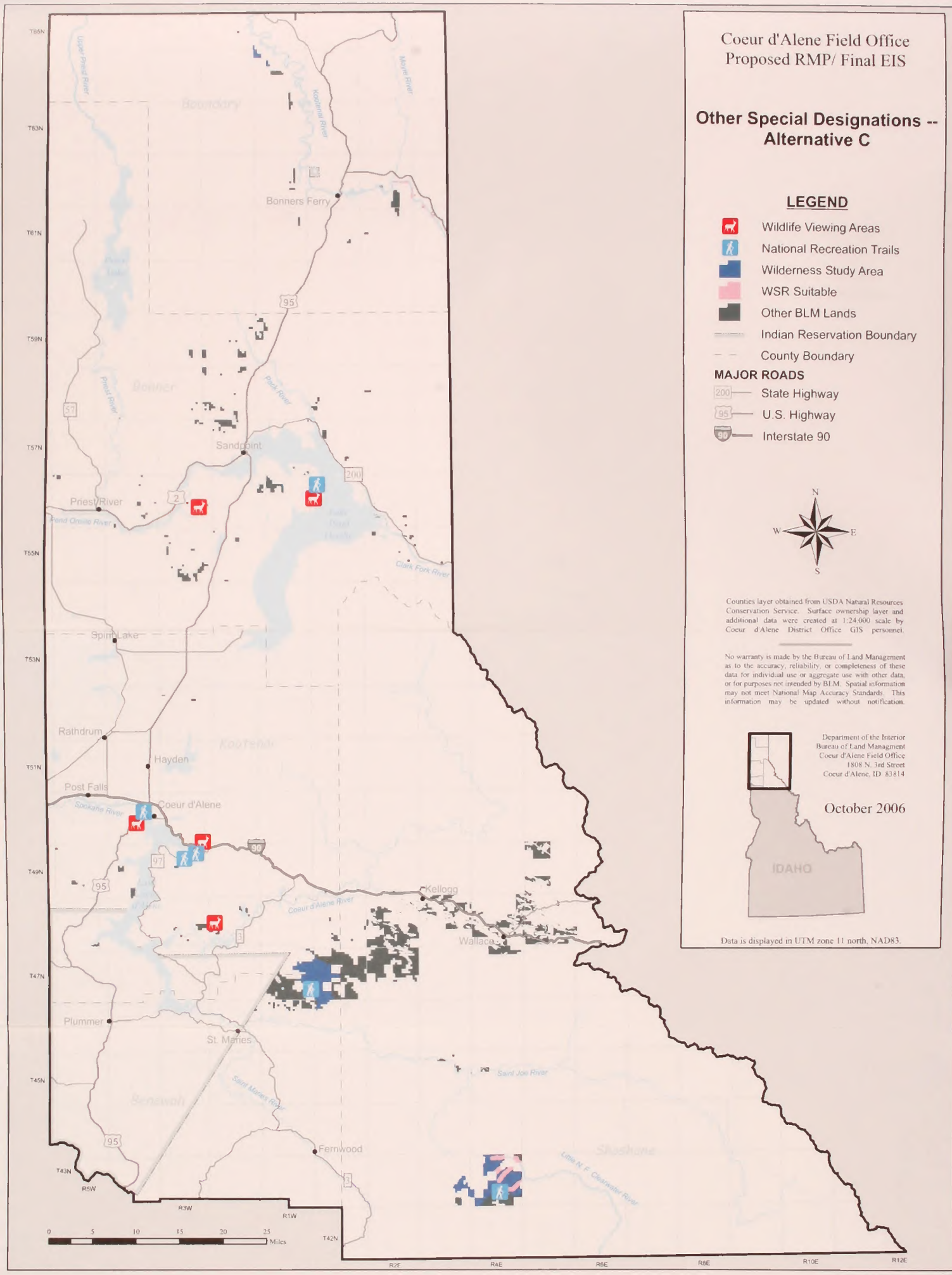
Map 44



Other Special Designations (Wilderness Study Areas, National Recreation Trails, and Wildlife Viewing Areas) Alternative B

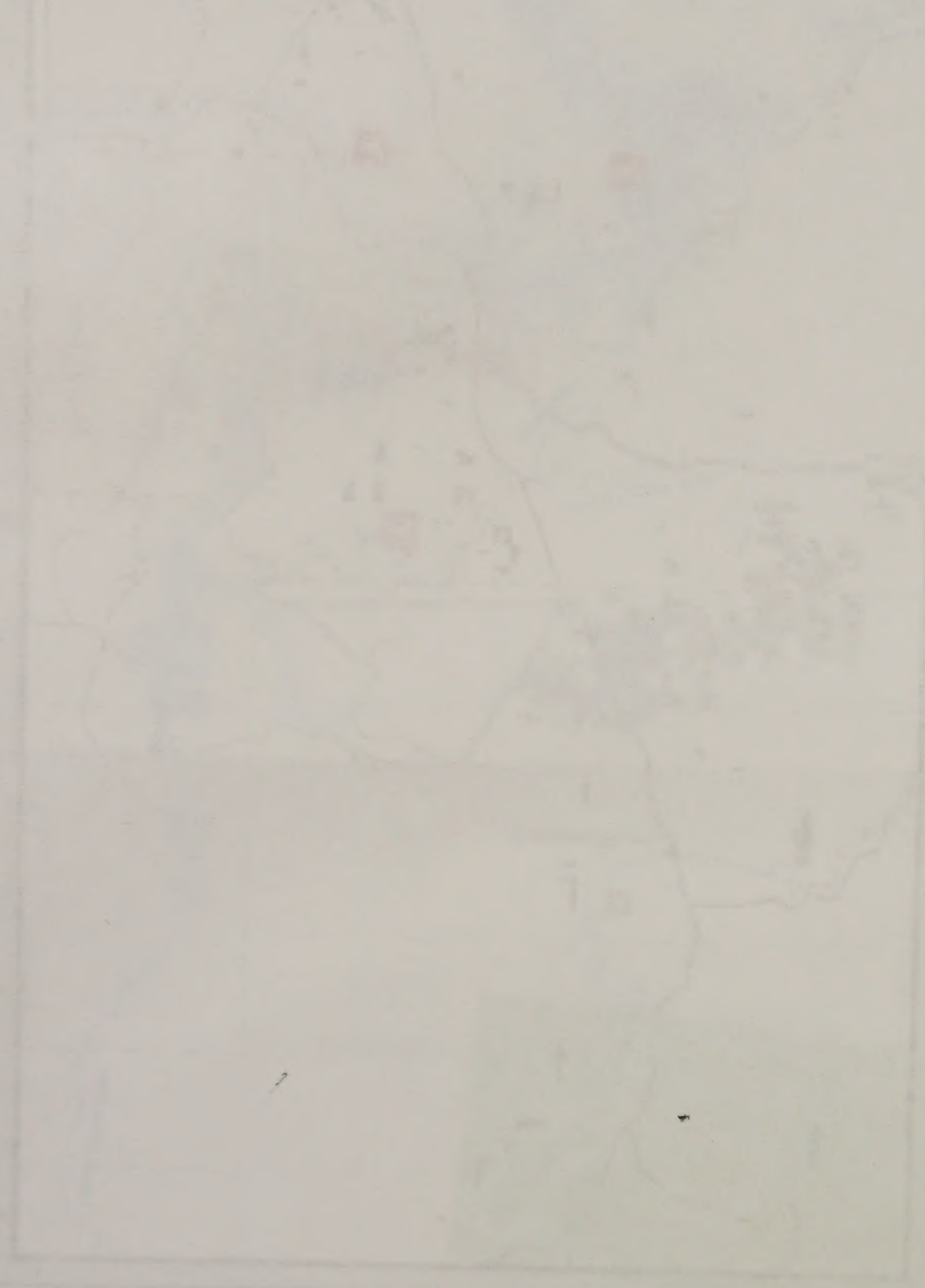
Map 66

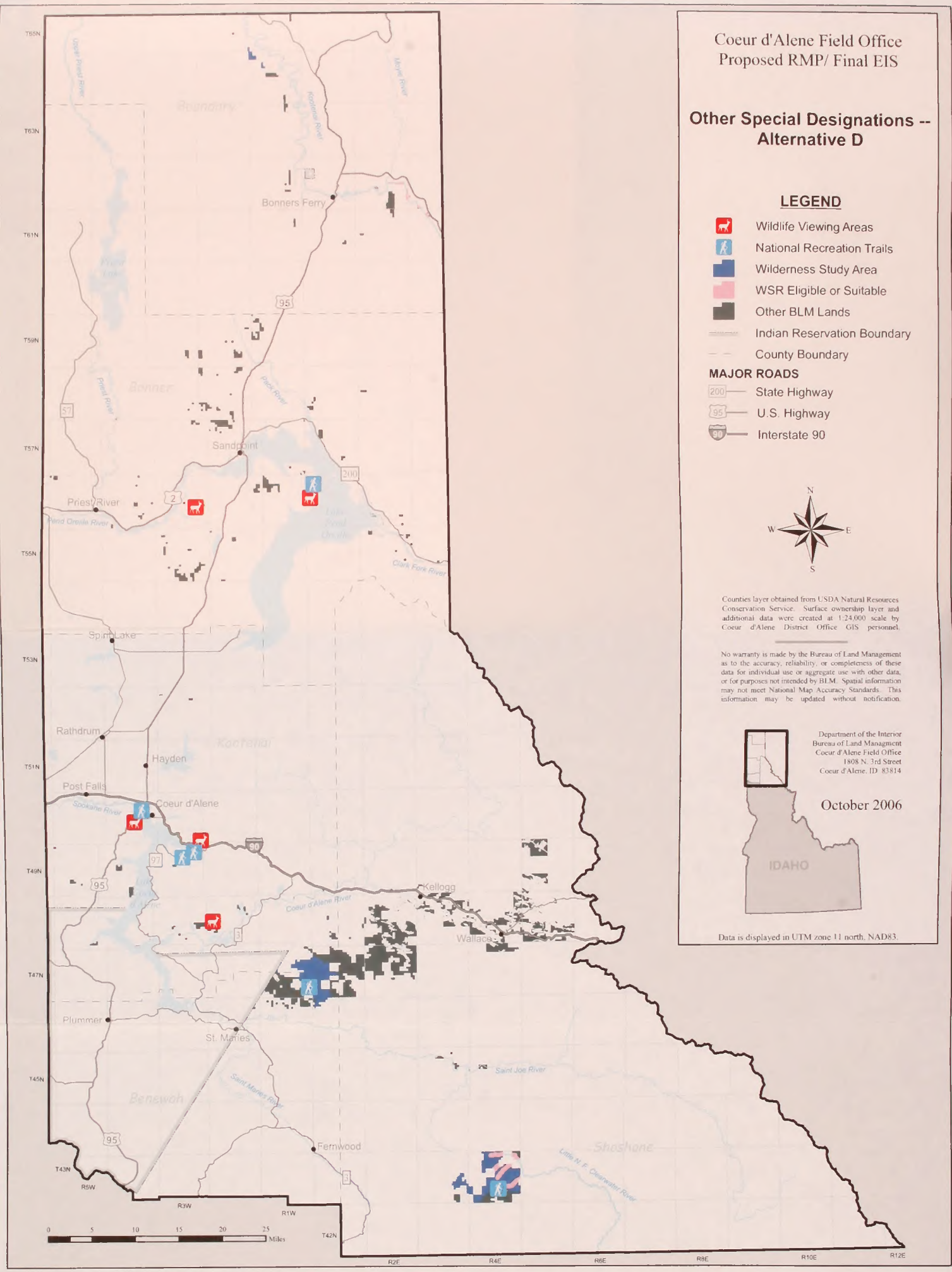




Other Special Designations (Wild/Scenic River Segments, Wilderness Study Areas, National Recreation Trails, and Wildlife Viewing Areas) -- Alternative C

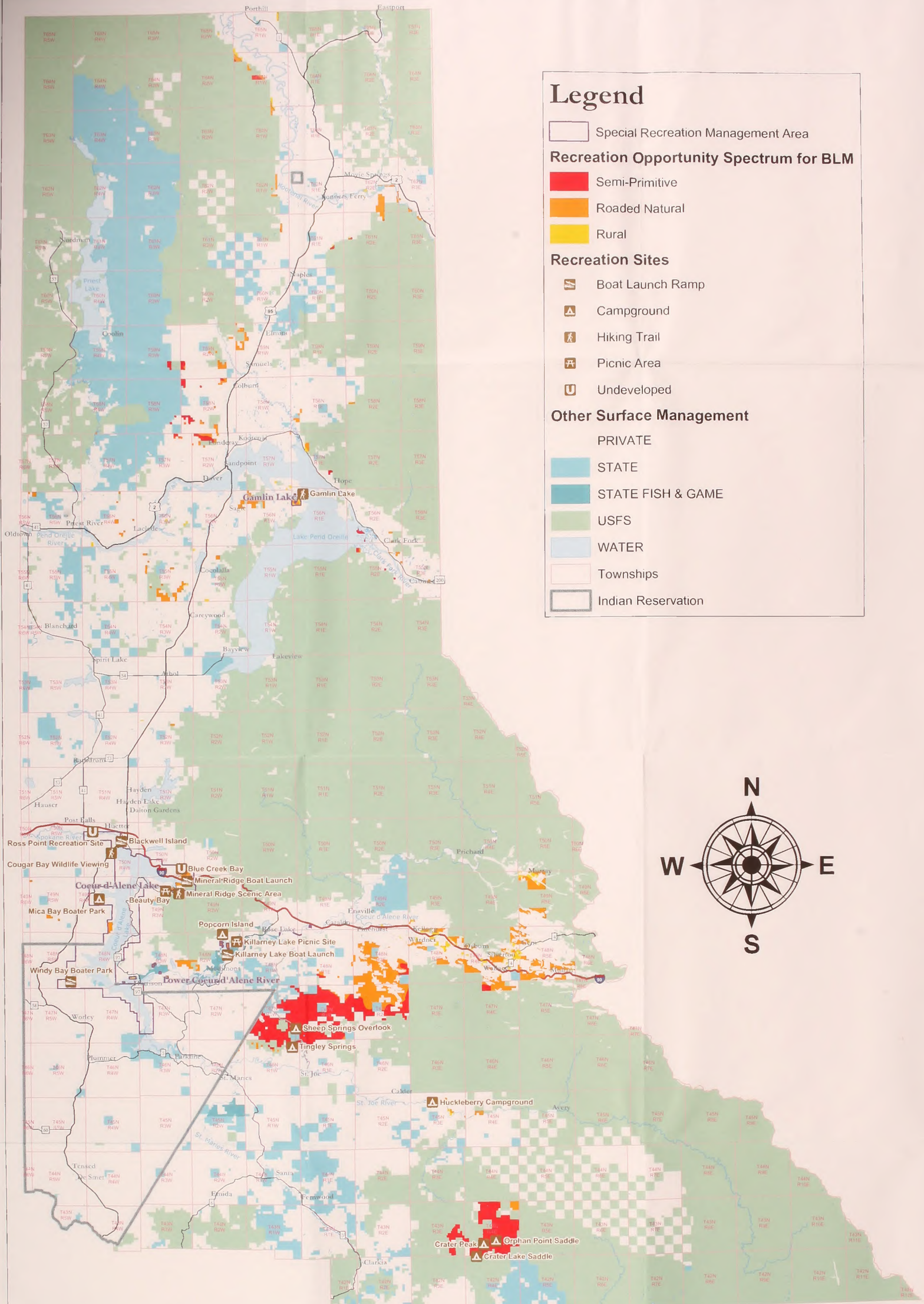
Map 67





Other Special Designations (Wild/Scenic River Segments, Wilderness Study Areas, National Recreation Trails, and Wildlife Viewing Areas) -- Alternative D

Map 68



US Department of the Interior
Bureau of Land Management

Coeur d'Alene Field Office
Proposed RMP/Final EIS

Coeur d'Alene, Idaho
October 2006

Special Recreation Management Areas and Developed Recreation Sites Alternative A

0 5 10 20 30 40 50
Miles

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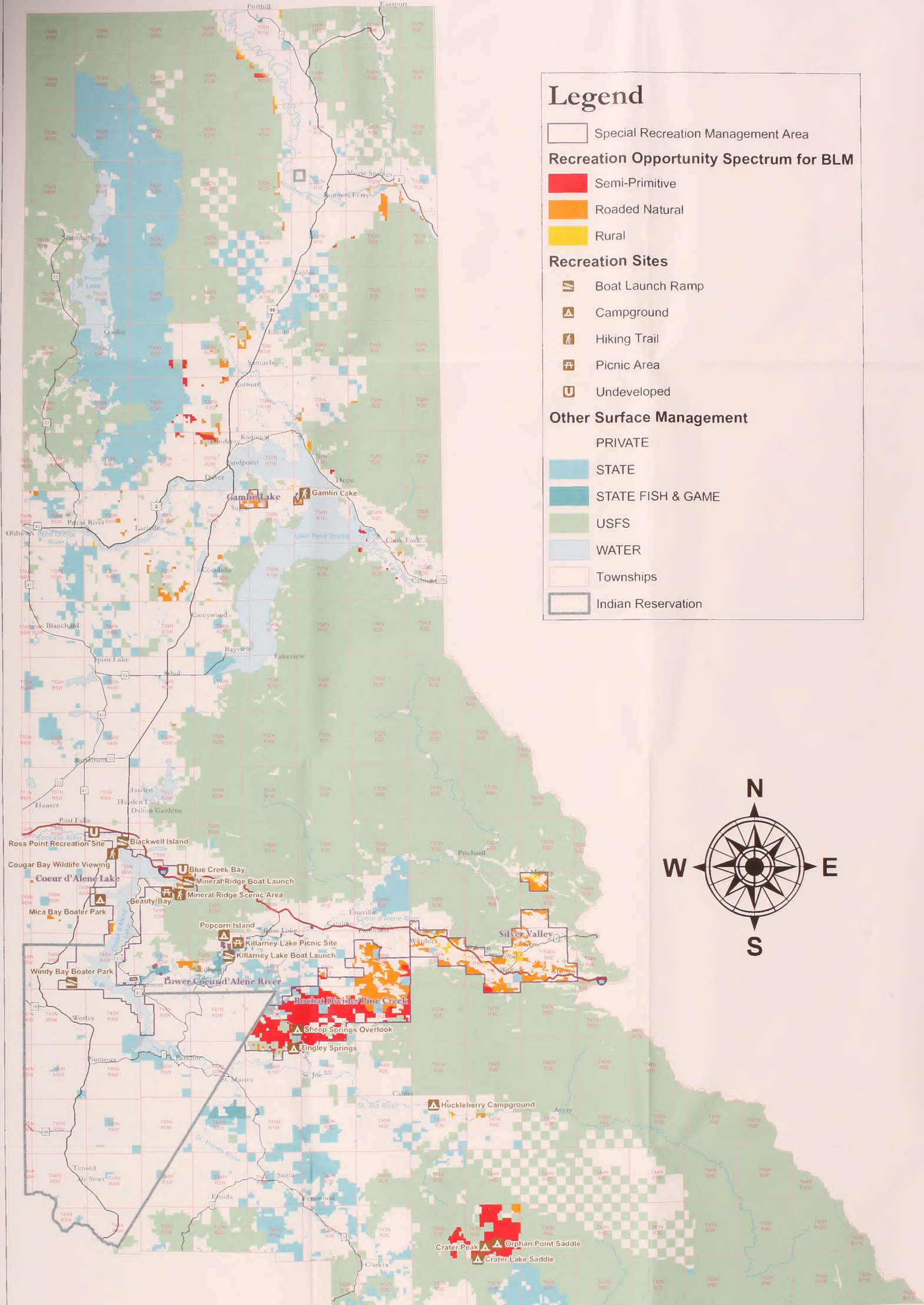
Idaho



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Bureau of Land Management

Coeur d'Alene Field Office
Proposed RMP/Final EIS

Coeur d'Alene, Idaho
October 2006

Special Recreation Management Areas and Developed Recreation Sites Alternative B

0 5 10 20 30 40 50
Miles

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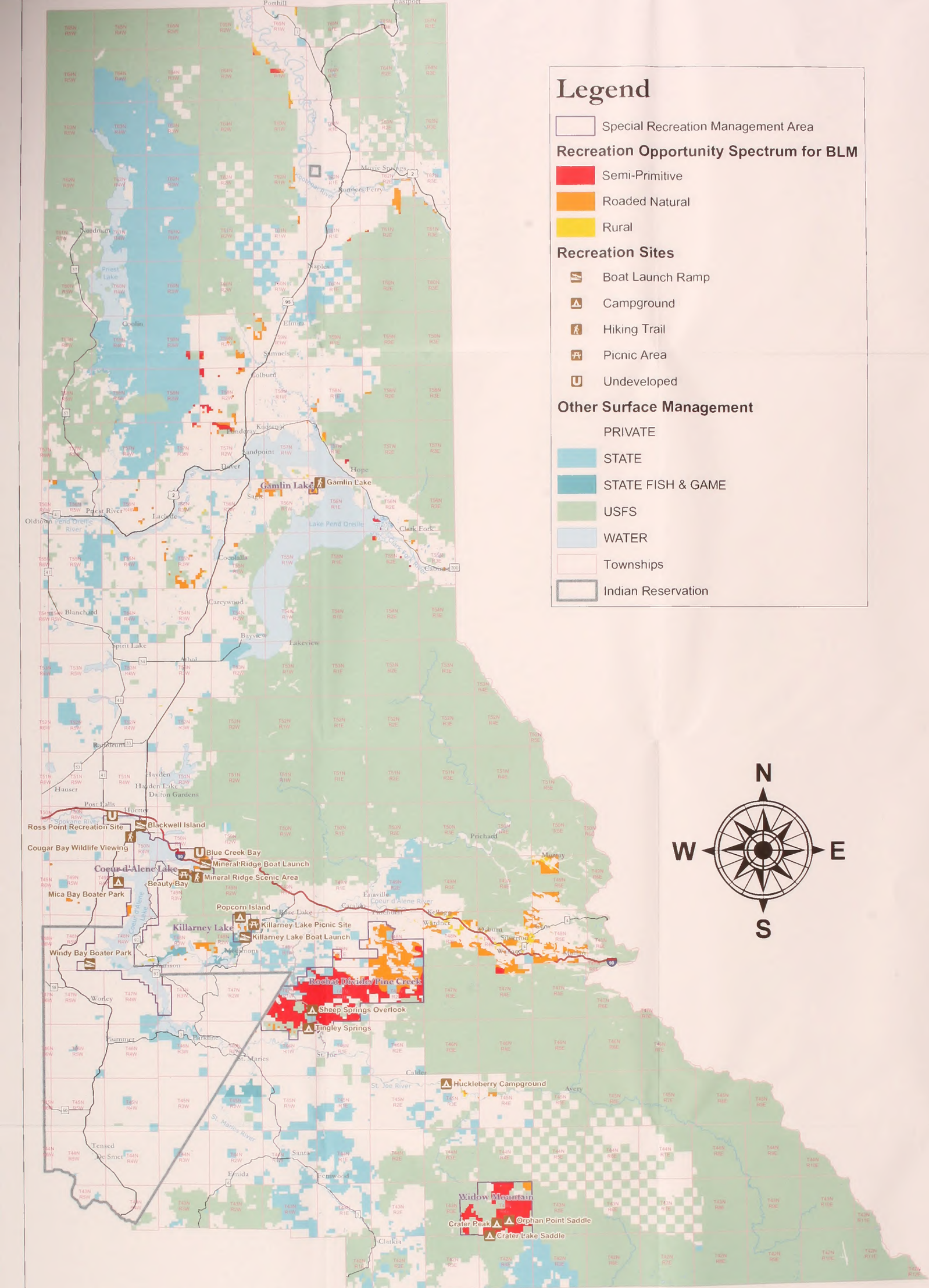

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Bureau of Land Management

Coeur d'Alene Field Office
Proposed RMP/Final EIS

Coeur d'Alene, Idaho
October 2006

Special Recreation Management Areas and Developed Recreation Sites Alternative C

0 5 10 20 30 40 50
Miles

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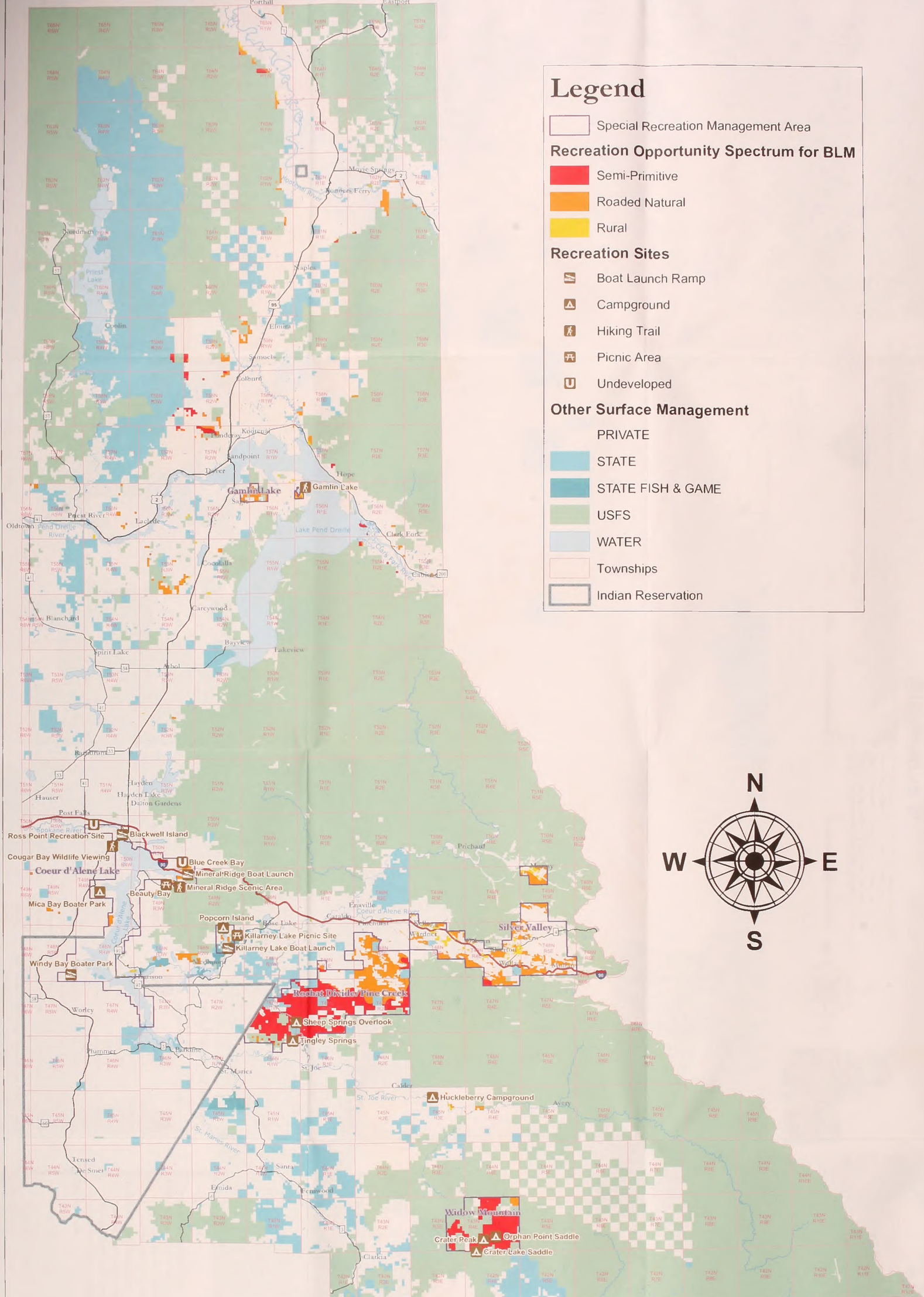

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Coeur d'Alene, Idaho
October 2006

Special Recreation Management Areas and Developed Recreation Sites Alternative D

0 5 10 20 30 40 50

Miles

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Coeur d'Alene, Idaho
October 2006

Motorized Route Designations - Silver Valley
Alternative D

Under Alternative D, motorized vehicle travel (except snowmobiles) is "limited" to designated roads and trails on all BLM managed land, except within areas designated as "closed" (see legend). Some of the designated roads and trails also have vehicle class or seasonal restrictions. There are no "open" areas under this alternative - off-road motorized travel is not permitted, except for snowmobiles. Snowmobiles are allowed to travel off-road on all BLM lands, except where depicted otherwise on this map.

0 1 2 4 6 8 Miles

N W E S

Idaho

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Road and Trail Restrictions

Roads and Trails shown in orange on the map are closed to vehicle travel during the time periods shown below.

3	12/1 to 3/31	12/1 to 3/31	12/1 to 3/31	No Restrictions
4	Yearlong	No Restrictions	No Restrictions	No Restrictions
8	12/1 to 3/31	12/1 to 3/31	12/1 to 3/31	12/1 to 3/31
9	Yearlong	12/1 to 3/31	12/1 to 3/31	12/1 to 3/31
10	8/30 to 1/1	8/30 to 1/1	8/30 to 1/1	8/30 to 1/1
14	Yearlong	8/30 to 1/1	8/30 to 1/1	8/30 to 1/1
20	Yearlong	Yearlong	No Restrictions	Yearlong
21	Labor to Memorial Day	Labor to Memorial Day	Labor to Memorial Day	No Restrictions
22	Labor to Memorial Day	Labor to Memorial Day	Labor to Memorial Day	Labor to Memorial Day
23	Yearlong	Labor to Memorial Day	Labor to Memorial Day	No Restrictions
25	4/1 to 11/15	4/1 to 11/15	4/1 to 11/15	4/1 to 11/15
26	Yearlong	Labor to Memorial Day	Labor to Memorial Day	Labor to Memorial Day
27	Yearlong	Yearlong	No Restrictions	No Restrictions

Legend

Travel Area Designation
- Closed to All Motorized Vehicles
- Motorized Vehicles, Except Snowmobiles, Limited to Designated Routes
- Motorized Vehicles, Including Snowmobiles, Limited to Designated Routes

Travel Route Designation
- Designated Road/Easement (Open year round to all motorized vehicles)
- Designated Road/Trail with Restrictions
- Proposed Federal Land Management Highways

Roads/Trails
- TRAIL
- UNIMPROVED ROAD
- LIGHT DUTY ROAD
- SECONDARY HWY
- HIGHWAY

Surface Management
- BLM
- PRIVATE
- STATE
- STATE FISH & GAME
- TRIBE
- USFS
- WATER
- STREAMS
- SECTION LINES